Appendix H-2: Comment letters from Tribes, Federal, State, and local agencies and elected officials to the Draft EIS

Per Forest Service Handbook 1909.15, Chapter 24.1(3), copies of comment letters received from Tribes, Federal, State and local agencies and elected officials are included here and are titled Appendix H-2 of the FEIS.

To Whom It May Concern:
Comments regarding the Spruce Beetle Epidemic - Aspen Decline Management Response EIS
The SBEADMR draft environmental impact statement proposes a proactive 8-12 year approach to move the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) to a healthier natural state, enabling the use of dead timber while the timber still has a market value. The citizens of the Montrose community are aware of the need for a healthier forest from multiple standpoints including recreation, public safety and socioeconomic impact - jobs.
While supporting the timbering of species of spruce/fir we would also like consideration on aspen management and possible timbering if a market can be developed.
We ask for improved protection of people and infrastructure, capacity to implement the maximum number of resiliency treatments available to improve the overall long-term health of the forest, and establish essential timber supply to our local timber industry and the significant number of jobs it generates throughout our community.
We would like support for the unquantifiable benefits such as decreased threat to life, property, water supply and quality, as well as values such as habitat improvement. Our community is primarily dependent on agriculture (including timbering) and recreation. Healthy forests are essential to us both economically and for our preferred quality of life.
City of Montrose
P.O. Box 790
Montrose, Colorado 81402

COLORADO PARKS & WILDLIFE

Northwest Regional Service Center
711 Independent Ave., Grand Junction, CO 81505
Phone (970)255-6100 • FAX (970)255-6111
wildlife.state.co.us • parks.state.co.us

September 10, 2013

Scott Armentrout
Forest Supervisor
2250 Highway 50
Delta, CO 814)6

RE: Colorado Parks and Wildlife Scoping Comments for Spruce Beetle Epidemic and Aspen Decline Management Response Project (SBEADMR Project)

Dear ~~Mr. Armentrout~~ Scott

Colorado Park and Wildlife (CPW) appreciates the opportunity to be involved with the Grand Mesa, Uncompahgre, and Gunnison National Forest in the scoping process for the spruce beetle epidemic and aspen decline management response project. The project planning area landscapes and associated wildlife habitat, natural resource, and socio-economic value are of utmost importance to CPW and the people of the state of Colorado.

CPW is intrigued by the concept of a single tiered Environmental Impact Statement analysis and its purpose of streamlining the environmental review process and creating more timely and effective, on-the-ground forest health project. It is worth noting, however, that this novel approach is largely untested, with many unknowns, and CPW requests that the Forest Service use conservative parameters in implementing this concept. CPW requests that the Forest Service coordinate closely and involve CPW staff at the project review level and at site visits.

CPW offers the following scoping comments, recommendations, and support for the SBEADMR Project.

AQUATIC CONSIDERATIONS

Native Fish Species, Riparian Areas, and Aquatic Resources

Native fish species and their habitat require special management action to avoid habitat degradation or loss. Occupied native fish habitat exist within the project area for Colorado River cutthroat trout (CRCT), Colorado Greenback cutthroat trout (GBCT or Lineage GB), a Federal and state-listed Threatened Species, roundtail chub, bluehead and flannelmouth sucker, Colorado species of special concern; sculpin, and speckled dace. These native fish species are declining range wide due to a number of factors including

degradation of habitat, reduced water quality and quantity. Any reduction in the capability of forest resources to support naturally reproducing populations may have severe consequences for the listing status of these species.

Water Quality Concerns

Sanitation

All equipment used in the project should be disinfected per CPW protocol prior to and after use of equipment in drainage. Decontamination protocol for chytrid should be followed regardless of whether the equipment had been 'pre-disposed': Contractors should always assume that the fungus is present and disinfect according. Rs-0-W in areas that are known to be contaminated should be implemented last.

Erosion control and sedimentation

Erosion and sedimentation generated from the project activities have the potential to affect fisheries. CPW recommends using the best available method of erosion control (applicable to site conditions) to ensure that runoff and sedimentation into creeks and streams is controlled.

Engineering and design standards

Use proper design standards for low water crossings. Culvert or bridge installations should be constructed during dry periods to minimize erosion and sedimentation. These structures should also not limit fish or river otter passage when they are installed. Culverts or crossings should be constructed under heavily used roads to provide migration corridors for use by amphibians and reptiles.

VEGETATIO CONSIDERATIONS

Integrated vegetation management plan

A project-wide noxious weed and invasive species inventory should be included in the project planning; identification mapping and action plans should be developed and integrated in to a comprehensive plan prior to any activity. Annual monitoring and follow-up activities should be part of the planning and implementation for this project.

The introduction of or spreading of non-native, undesirable vegetation and noxious weeds is a challenge to control in large-scale activities such as this vegetation management project. Large scale projects create conditions favorable for the introduction and spread of weeds. Reducing the impact of weeds is a vigilant, and long-term multiple seasons effort. Weed management activities should be monitored along with reclamation success on at least an annual basis.

Reclamation

CPW encourages reclamation and subsequent monitoring be designed and implemented to ensure superior results for areas of disturbance.

WILDLIFE HABITATS

CPW believe it is necessary to conduct pre-treatment biological surveys and clearance for each area scheduled for treatment; ensure that surveys are current. The timing of implementing forest treatment activities should be based on the wildlife that is present at the treatment location and its sensitivity and life stage needs ; CPW is particularly interested in big game, aquatic species, raptors, migratory song birds and non-game species.

CPW recommends that the Forest Service use best management practices (BMPs), to minimize project impacts to species/habitat during critical life stages or seasons, for example elk calving, mule deer and elk winter range, spawning, or nesting periods.

CPW believes that select treatment methods such as controlled burns and hand thinning are appropriate in sensitive or protected areas. Treatment areas should be prioritized based on the importance and contribution to an overall healthy forest and wildlife habitat even if the area falls within a protected area.

COLORADO SPECIES OF SPECIAL CONCERN

Project maintenance activities should avoid or minimize habitat impact and conserve plants and animals that are species of special concern. The actions of this project should not degrade or destroy habitat that would lead to the overall decline of the species but rather improve conditions so that the species can eventually be removed from the state threatened or endangered status lists. Species and or habitats identified are boreal toad, northern leopard frog, Gunnison's and white-tailed prairie dog, river otter and several species of bat are known to use aspen and coniferous forest.

RECREATION CONSIDERATIONS

CPW and the Forest Service should work closely to coordinate road/travel designations, opening s/closure. and seasonal use. CPW believes that a clear description of how roads will be managed during active treatment periods and post treatment activities will benefit recreation use and support for forest activities.

Big Game Hunting Seasons

Big game hunting season begins in late August (archery season) and continues until the middle of November (rifle season); rural county roads and FS roads may see an increase in traffic due to hunters being in the field. Forest Service staff and contractors should strive to schedule a minimal amount of activities for peak hunting weekends during this time of the year to avoid potential user conflict and accidents and provide hunters with a positive experience. Where activities must occur in hunting season CPW encourages Forest Service staff and contractors to wear blaze orange or other brightly colored safety vest.

CPW RESEARCH

CPW staff is conducting research regarding the impacts of beetle kill on mammals and songbird communities in the state. Mammal studies will focus on snowshoe hare and red squirrels as they are the primary prey species for lynx. CPW will be using cameras as the primary sampling mechanism for mammals, which will capture many species, including furbearers and other game species. Avian sampling will occur via point counts and the analyses will be tied to the suite of species that are amenable to that type of sampling.

CPW is planning to sample during 2 summer seasons, beginning May/June 2013. CPW intends to sample statewide, including areas impacted by both pine beetle and spruce beetle, so CPW staff will be working in all 4 regions. CPW would like to make the Forest Service aware of these studies.

CPW respectfully offer these recommendations and comments in support of the Forest Service's desire to develop a SBEADMR project document that will provide policy protection of wildlife populations, habitat resources and vegetation communities within the Grand Mesa, Uncompahgre, and Gunnison Forest boundaries. We value the opportunity and ability to work together with the Forest Service on this important project. If you have any questions or would like clarification on any comments in this letter please contact Michael Warren at 970-255-6180.

Sincerely,

Ron

Ron D. Velarde, NW Regional Manager

cc.

Steve Yamashita, Acting Director, Colorado Park & Wildlife
Chad Bishop, Assistant Director for Wildlife and Natural Resources
Patt Dorsey, SW Regional Manager
Dean Riggs, NW Assistant Regional Manager
Brad Petch, NW Senior Terrestrial Biologist
Sherm Hebein, NW Region Senior Aquatic Biologist
JT. Romatzke, Area Wildlife Manager
file

CDOW Recommended Stipulations for Oil and Gas Within the State of Colorado

Wildlife Species	***Habitat Types***	***No Surface Occupancy Stipulation (area or buffer distance)***	***Timing Limitation Stipulation (time period - may be greater than 60 days)***	***Controlled Surface Use Stipulation (potential facility relocate or other operational constraint)***
Bats (Brazilian Free-tailed, Townsend's Big-eared, Fringed Myotis)	*Roost Sites*	Within 0.25 Miles of Roost Site	N/A	A bat inventory may be required prior to approval of operations within historic mining complexes. These are areas where bats are suspected or the habitat is deemed suitable but no bats have been documented. The inventory data will be used to apply conservation measures to reduce the impacts of surface disturbance on bat habitat
Bighorn Sheep			(TL for human activities in these habitats including over flights)	
	Production Areas	Entire Mapped Production Area	April 15-June 30 (Rocky Mountain) February 1-May 1 (Desert)	N/A
	Winter Range	Entire Mapped Winter Range Area	November 1-April 15	N/A
Black Footed Ferret	*Release Areas*	N/A	Entire Area March 1-July 15	N/A
Columbian Sharp-tailed Grouse	*Leks*	Within 0.4 Miles of Lek Sites	N/A	N/A
	Winter habitat	N/A	Restrict development between Dec 1- March 15	Limit noise not to exceed 49 dB measured 30 ft. from source.
	Production Areas (Breeding and Nesting habitat	N/A	Within 1.25 Miles of Lek Sites March 15-July 30	Surface Density Limitation of one pad per section; Relocate compressors > 1.25 miles from lek; Limit noise not to exceed 49 dB measured 30 ft. from source.
Cutthroat Trout	*Designated Cutthroat Habitat*	300-Feet from OHWM	SEE Aquatic Species stip	N/A
	Designated Cutthroat Habitat Watershed	N/A	N/A	Surface Density Limitation of one pad per section
Mule Deer	*Crucial Winter Ranges (Severe Winter Range and Winter Concentration Areas)*	N/A	December 1-April 15	Surface Density Limitation of one pad per section or consider off site mitigation
Elk	*Crucial Winter Ranges (Severe Winter Range and Winter Concentration Areas)*	N/A	December 1-April 15	Surface Density Limitation of one pad per section or consider off site mitigation actions
	Production Areas	N/A	May 15-June 30	Surface Density Limitation of one pad per section or consider off site mitigation actions

Gunnison/Greater Sage-grouse	*Leks* [1]	Within 0.6 Miles of Lek Sites	N/A	N/A
	Core Areas (Occupied Habitat = Core Area for Gunnison sage-grouse)	No Lease	N/A	Surface Density Limitation of one pad per section; Relocate compressors > 4 miles from lek; Limit noise not to exceed 49 dB measured 30 ft. from source.
	Winter Range	N/A	December 1-March 15	Surface Density Limitation of one pad per section; Relocate compressors > 4 miles from lek; Limit noise not to exceed 49 dB measured 30 ft. from source.
	Production Areas (Breeding and Nesting habitat	N/A	Within 4 Miles of Lek Sites March 1-June 30	Surface Density Limitation of one pad per section; Relocate compressors > 4 miles from lek; Limit noise not to exceed 49 dB measured 30 ft. from source.
Greater Prairie Chicken	*Leks*	Within 0.6 Miles of Lek Sites	N/A	N/A
	Production Areas (Breeding and Nesting habitat	N/A	Within 2.2 miles of Lek sites March 1-June 30	Surface Density Limitation of one pad per section; Limit noise not to exceed 49 dB measured 30 ft. from source.
Kit Fox	*Den Sites*	N/A	Within 0.25 mile of den sites February 1-May 1	Pre-construction survey for den sites may be required
Least Tern	*Production Areas (Breeding and Nesting habitat)*	Within 300 Feet OHWM	0.5 Miles-No Human Encroachment-April 1-July 31	N/A
Lesser Prairie Chicken	*Leks* [2]	Within 0.6 Miles of Lek Sites	N/A	N/A
	Core Areas	No Lease	N/A	Surface Density Limitation of one pad per section; Relocate compressors > 2.2 miles from lek; Limit noise not to exceed 49 dB measured 30 ft. from source.
	Production Areas (Breeding and Nesting Habitat)		Within 2.2 Miles of Lek Sites March 15-June15	Surface Density Limitation of one pad per section; Relocate compressors > 2.2 miles from lek; Limit noise not to exceed 49 dB measured 30 ft. from source.
Lynx		Consult with DOW regarding Lynx use of the development area		
Mountain Plover	*Active Nest Site*	Within 300 Feet of Active Nest	N/A	Pre-construction survey for nest sites may be required
Piping Plover	*Production Areas (Breeding and Nesting Habitat)*	Within 300 Feet OHWM	Within 0.5-No Human Encroachment-April 1-July 31	N/A

Plains Sharp-Tailed Grouse	*Leks*	Within 0.4 Miles of Lek Sites	N/A	N/A
	Core Areas	No Lease	N/A	Surface Density Limitation of one pad per section; Relocate compressors > 1.25 miles from lek; Limit noise not to exceed 49 dB measured 30 ft. from source.
	Production Areas (Breeding and Nesting Habitat)	N/A	Within 1.25 Miles of Lek Sites-March 1- June 30	Surface Density Limitation of one pad per section; Relocate compressors > 1.25 miles from lek; Limit noise not to exceed 49 dB measured 30 ft. from source.
Prairie Dogs (White-tailed/Gunnison's)	*Colonies*	N/A	March 1-June 15	Pre-construction survey for active colonies may be required; avoid direct disturbance to active colonies when possible
Preble's and New Mexico Meadow Jumping Mouse	*Known and Potential Occupied Habitat*	Within 300 ft. of stream centerline	N/A	N/A
Pronghorn Antelope	*Winter Concentration Areas*	N/A	January 1-March 31	N/A
Bald Eagle	*Active Nest Site* [3]	Within 0.25 Miles of Nest Site	N/A	Pre-construction nest surveys may be required
	Active Nest Site	N/A	0.5 Miles- No Human Encroachment October 15-July 31	
	Active Winter Night Roost Sites [4]	Within 0.25 Miles of Roost Site	N/A	Pre-construction roost surveys may be required
	Active Winter Night Roost Sites	N/A	0.5 Miles- No Human Encroachment November 15 - March 15	
Ferruginous Hawk	*Active Nest Site* [3]	Within 0.5 Miles of Nest Site	N/A	Pre-construction nest surveys may be required
	Active Nest Site	N/A	0.5 Miles- No Human Encroachment February 1-July 15	
Golden Eagle	*Active Nest Site* [3]	Within 0.25 Miles of Nest Site	N/A	Pre-construction nest surveys may be required
	Active Nest Site	N/A	0.5 Miles- No Human Encroachment December 15-July 15	
Mexican Spotted Owl	*Protected Activity Centers (PAC)*	Entire PAC	N/A	Pre-construction nest surveys may be required
	Protected Activity Centers (PAC)	N/A	Adjacent PAC Areas- No Human Encroachment March 1-August 31	
Northern Goshawk	*Active Nest Site* [3]	Within 0.5 Miles of Nest Site	N/A	Pre-construction nest surveys may be required
	Active Nest Site	N/A	0.5 Miles- No Human Encroachment March 1-September 15	
Osprey	*Active Nest Site* [3]	Within 0.25 Miles of Nest Site	N/A	Pre-construction nest surveys may be required
	Active Nest Site	N/A	0.25 Miles- No Human Encroachment April 1-August 31	
Peregrine Falcon	*Active Nest Site* [3]	Within 0.5 Miles of Nest Site	N/A	Pre-construction nest surveys may be required
	Active Nest Site	N/A	0.5 Miles- No Human Encroachment March 15-July 31	

Prairie Falcon				
	Active Nest Site [3]	Within 0.5 Miles of Nest Site	N/A	Pre-construction nest surveys may be required
	Active Nest Site	N/A	0.5 Miles-No Human Encroachment March 15-July 15	
Swainson's Hawk				
	Active Nest Site [3]	Within 0.25 Miles of Nest Site	N/A	Pre-construction nest surveys may be required
	Active Nest Site	N/A	0.25 Miles- No Human Encroachment April 1-July 15	
Other Raptors Not Listed Above				
	Nesting Habitat	N/A	No Human Encroachment January 1-July 15	Pre-construction nest surveys may be required
	Roost Sites	N/A	No Human Encroachment November 15-April 1	
Burrowing Owl				
	Active Nest Site	N/A	300 Foot March 1-August 15	N/A
River Otter				
	Occupied Habitat	N/A	N/A	Minimize disturbance of riparian vegetation and road development within 300 ft. of occupied habitat
Southwest Willow Flycatcher				
	Active Nest Site	Within 300 Feet of Nest Site	N/A	Pre-construction nest surveys may be required
	Suitable habitat (USFWS minimum patch size definition)		Restrict activities between May 15-Aug 1	Pre-construction nest surveys may be required
Swift Fox				
	Den Sites	N/A	0.25 Mile March 15-June 15	Pre-construction survey for den sites may be required
Northern Leopard Frog				
	Breeding Sites	Within 0.25 Miles of Breeding Site	N/A	N/A
Western Boreal Toad				
	Breeding Sites	Within 0.5 Miles of Breeding Site	N/A	N/A
Aquatic Species				
	Gold Medal Water	300 Feet from OHWM	N/A	N/A
	Rainbow Trout	N/A	March 1-June 15	N/A
	Brown Trout	N/A	October 1-May 1	N/A
	Brook Trout	N/A	August 15-May 1	N/A
	Cutthroat Trout	N/A	June 1-September 1	N/A
	Bluehead Sucker	N/A	May 1-July 15	N/A
	Flannelmouth Sucker	N/A	April 1-July 1	N/A
	Roundtail Chub	N/A	May 15-July 15	N/A

[1] Greater and Gunnison sage-grouse lek = any lek active within last 10 years (core area); any lek active within last 5 years (outside core area)

[2] Lesser prairie chicken lek = any lek active within last 3 years

[3] Active Nest Site = any nest that is frequented or occupied by a raptor during the breeding season, or which has been frequented or occupied in any of the five previous breeding seasons

[4] Active Bald Eagle Winter Night Roost = Areas where bald eagles gather and perch overnight, and sometimes during the day in the event of inclement weather.

COLORADO
Parks and Wildlife
Department of Natural Resources

Southwest Region Office
415 Turner Drive
Durango, CO 81303

Mr. Scott Armentrout, Forest Supervisor
Grand Mesa Uncompahgre and Gunnison National Forests
2250 Highway 50
Delta, CO 81416

28 July 2015

RE: COLORADO PARKS AND WILDLIFE COMMENTS FOR THE DRAFT GRAND MESA, UNCOMPAHGRE, AND GUNNISON NATIONAL FOREST ENVIRONMENTAL IMPACT STATEMENT (DEIS): SPRUCE BEETLE EPIDEMIC AND ASPEN DECLINE MANAGEMENT RESPONSE (SBEADMR)

Dear Mr. Armentrout:

Colorado Parks and Wildlife appreciates the opportunity to review the DEIS for the Spruce Beetle Epidemic and Aspen Decline Management Response. CPW provided scoping comments and recommendations in September of 2013 and was pleased to see some of our recommendations incorporated into the DEIS. The following comments are submitted from CPW Southwest Region. For reference the Southwest Region encompasses all of the Uncompahgre National Forest (NF), all of the Gunnison NF except for a small portion near Ragged Mountain, and the portion of the Grand Mesa NF south of the Mesa-Delta County Line to the Gunnison NF boundary (Figure 1.)

PROJECT SUMMARY & RECOMMENDATIONS:

We understand that the Grand Mesa, Uncompahgre, and Gunnison National Forest's (GMUG) SBEADMR project is a proposal to implement multiple vegetation management actions to treat spruce and aspen forests impacted by spruce beetle and Sudden Aspen Decline. The purpose of these treatments is to improve forest resiliency and recovery and to reduce the public safety threats created by hazard trees.

The project proposes to treat a total of 120,000 acres over an 8-12 year period: commercially treating 4,000-6,000 acres per year and mechanically treating and/or using prescribed fire to treat approximately 3,000-6,000 acres per year. We understand the rationale in not specifying the treatment areas in the DEIS. It is our understanding that the GMUG will develop detailed plans of the treatment areas after the EIS is final and project implementation planning begins. CPW is very interested in providing the GMUG with our on-the-ground wildlife expertise to assist in treatment design and implementation.

Spruce/fir and aspen forests are some of the most widespread and productive habitat types for a wide variety of wildlife species in Colorado. The beetle epidemic has the potential to change forest types at a landscape scale, with or without treatment. The ecological effects of this conversion are difficult to predict. Consequently, we anticipate that wildlife responses from the spruce beetle epidemic will be complex, species specific, and spatially and temporally dynamic.

CPW offers the following recommendations on the Draft EIS/SBEADMR with the intent of assisting the GMUG in its preparation of a compelling final EIS. Comments and supporting information follow these recommendations.

1. For the **"Three Species," i.e., flannelmouth sucker, bluehead sucker, and roundtail chub**, CPW recommends: conducting an inventory and analysis, identifying treatment areas and mapped conservation waters within the project boundary and developing design criteria and features to protect native fish and their habitats;
2. Add and/or strengthen design features to avoid the spread of **invasive species;**
3. For **big game** species, CPW recommends: designing specific projects to meet USFS objectives and CPW's **mule deer** strategy, coordinating timber harvest activities and or burns to avoid critical time periods for big game, incorporating timing limitations into design features so they remain in place for life of the project.
4. For **Gunnison Sage Grouse**, CPW recommends: conducting a Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS) within designated Critical Habitat, coordinating with the BLM as described in the final EIS Record of Decision, conducting a review of potential treatment areas within designated Critical Habitat to apply treatments to aspen stands.
5. For **Canada lynx,** CPW recommends: including design criteria to minimize understory disturbance and including a project selection criterion to evaluate the understory and advanced regeneration, and avoiding quality lynx/hare habitat.
6. Adopt a road planning and implementation strategy so that the project achieves an overall **no net increase of road miles** within the project boundary and treatment areas.

AQUATIC WILDLIFE SPECIES: NATIVE NON-SALMONID FISH HABITAT

An inventory and analysis of the potential impacts to "the Three Species," will add great value to the integrity of the final EIS.[1] Streams such as Cunningham Creek, Terror Creek and Hubbard Creek Middle Fork in Delta County are examples of habitats fall within the proposed treatment area and may be affected.

AQUATIC WILDLIFE SPECIES: INVASIVE SPECIES

CPW recommends that the Forest Service add and/or strengthen design features that address equipment sanitation to avoid the spread of Aquatic Nuisance Species (ANS), noxious weeds and other invasive species. Decontamination protocol for chytrid fungus should occur regardless of whether the equipment had been "pre-disposed." Forest Service contractors should always assume that the fungus is present and disinfect accordingly. Areas that are known to be contaminated with chytrid fungus should be treated last.

TERRESTRIAL WILDLIFE SPECIES: BIG GAME

CPW supports large aspen treatment projects (>40 acres) when they avoid crucial sensitive periods for big game. We recommend that the Forest Service incorporate specific timelines into design features so that the timing of treatment activities and wildlife protections remain consistent over the life of the project. Attached is a document titled *Colorado Recommended*

[1] These three native fish are USFS "Sensitive Species." The Upper Colorado River Basin States (Colorado, Utah and Arizona) have adopted a Rangewide Conservation Agreement for these species and Colorado has designated the roundtail chub as a State Species of Special Concern.

Stipulations for Oil and Gas within the State of Colorado (Attachment 1). While CPW developed this document to reduce impacts from oil and gas operations on wildlife, many of the timing and distance buffer recommendations are applicable in developing design guidelines to protect wildlife in other land use/management plans, including the Final EIS.

Mule deer are mentioned infrequently in this planning document. This iconic western big-game animal has been declining throughout the West, in numbers and distribution, due to a variety of causes. Colorado's estimated population in 1983 was about 625,000. Today, Colorado's population is estimated at 391,000. Due in part to the growing concern about mule deer populations across the West, Colorado is implementing a "Mule Deer Strategy." We think that the SBEADMR project is an ideal opportunity to coordinate treatments that achieve forest objectives and CPW's objectives outlined in our deer strategy.

CPW supports the Forest Service's range of tools proposed to implement forest treatments. Our Mule Deer Strategy (2014) recommends many of the same treatment tools e.g., hydro axe, roller-chop, prescribed fire, etc. to manage habitat for deer. CPW requests that the Forest Service identify opportunities to add the following actions in the planning, design features, and implementation of site specific project activities:

1) Pursue separate habitat treatments for deer and elk on the same landscapes to minimize overlap and lessen forage competition;
2) Work closely with CPW staff to create and share a habitat treatment and monitoring database for this project;
3) Work closely with CPW staff to monitor effectiveness of habitat management to inform future decisions.

Big game hunting season begins in late August (archery season) and continues until the middle of November (rifle season); rural county roads and FS roads may see an increase in traffic due to hunters being in the field. We recommend that Forest Service incorporate a design feature to help schedule a minimal amount of activities for peak hunting weekends during this time of the year to avoid potential user conflicts and provide hunters with a positive experience.

TERRESTRIAL WILDLIFE SPECIES: GUNNISON SAGE-GROUSE

In November of 2014, the United States Fish and Wildlife Service (USFWS) determined that the Gunnison sage-grouse (GuSG) warranted protection as a threatened species under the federal Endangered Species Act (16 U.S.C. 1531-1534). Management activities within designated Critical Habitat require a Section 7 consultation with the U.S. Fish and Wildlife Service (USFWS).

GuSG require a variety of habitats, including large expanses of sagebrush with a diversity of grasses and forbs (fall and winter) and healthy wetland and riparian areas including aspen stands (at approximately 8500-9500 feet in elevation) for summer brood rearing. The Forest Service Draft EIS states on page 298 that: "Although the proposed treatment activities do not involve suitable habitat for this species, Gunnison sage-grouse could potentially be affected because transportation routes to access treatment areas and haul material may cross occupied habitat consisting of National Forest, Bureau of Land Management and private lands." We concur that hauling could negatively impact Gunnison sage-grouse. We also see an opportunity to enhance GuSG habitat in some aspen treatment areas.

The Colorado State Office of the Bureau of Land Management (BLM) is preparing a programmatic EIS for GuSG. The USFS and CPW are Cooperating Agency partners in the development of that EIS. We recommend the Forest Service work closely with the BLM to address Gunnison sage-grouse protections described in the final EIS Record of Decision.

CPW reviewed the overlap between potential project locations in the SBEADMR DEIS (GMUG) aspen and spruce map layers and the USFWS' designated Critical Habitat and found numerous locations where treatment areas lie within designated Critical Habitat. We recommend conducting a more extensive review of potential treatment areas within designated Critical Habitat to apply treatments to aspen stands. CPW has identified the following potential treatment areas within the Southwest Region that lie within Critical Habitat for your review and consideration:

Montrose County: T45N, R11W, S16, New Mexico Meridian; T46N, R11W, S34, New Mexico Meridian; T49N, R6W, S14, 15, 16, 21, 22, 23, 26, 27, New Mexico Meridian

Gunnison County:
T15S, R87W, S25, 26, 36, 6PM; T49N, R4W, S5, 6, 7, 8, New Mexico Meridian; T49N, R5.5W, S12, 14, 23, New Mexico Meridian; T49N, R6W, S13, 24, 25, New Mexico Meridian; T50N, R4W, S31, 32, New Mexico Meridian; T51N, R2W, S10, 11, 14, New Mexico Meridian

Saguache County:
T45N, R1E, S9, 10, 15, New Mexico Meridian; T45N, R2E, S25, New Mexico Meridian; T46N, R3E, S5, 16, 20, 21, 28, New Mexico Meridian; T47N, R1E, S10, 11, 12, 13, 14, 15, 22, 23, 24, New Mexico Meridian; T47N, R3E, S31, 32, New Mexico Meridian

Most of these lower elevation aspen stands are smaller patches, and treatments may be susceptible to over browse by domestic cattle and wild ungulates. In order to achieve treatment goals and desired outcomes, treatments in these stands need to be carefully timed and on a sufficient landscape scale. Please refer to, the GuSG Rangewide Conservation Plan (RCP 2005) (http://cpw.state.co.us/learn/Pages/GunnisonSagegrouseConservationPlan.aspx) and the USFWS to develop appropriate design features to ensure that impacts on Gunnison sage-grouse from the proposed project are avoided, minimized, and mitigated.

TERRESTRIAL WILDLIFE SPECIES: LYNX

CPW reintroduced lynx in Colorado from 1999-2006 and actively monitored lynx through 2010. Subsequently we have a significant amount of data on lynx locations and den sites. In the fall/winter of 2014/15 CPW initiated a long term lynx occupancy monitoring program in the San Juan Mountains, and collaborated with the Rio Grande NF on a lynx project designed to evaluate the impacts from spruce beetle kill on lynx and snowshoe hares .

Snowshoe hares comprise a major portion of the lynx diet. Hare populations in Colorado rely heavily on the understory structure and advanced regeneration of the forest. In areas where understory structure exists or has been enhanced by over-story mortality hare populations have benefited. Results from CPW and USFS monitoring efforts indicate that lynx are still present in nearly all of the areas they inhabited prior to the spruce beetle outbreak on the Rio Grande NF (roughly 4-6 years ago depending on location). In 2015 two GPS-collared female

lynx produced kittens within beetle-killed forest patches. Thus, we believe that areas lacking a living overstory, but with a sufficient understory are continuing to function as lynx habitat.

The EIS indicates that when timber is salvaged, some portion of the understory is disturbed or damaged. We recommend including design criteria to minimize understory disturbance that may degrade lynx and hare habitat quality. Design criteria may include: increasing distance between skid trails, using machinery to pluck and stack logs, and requiring winter salvage, etc. in areas with advanced understory regeneration.

In addition, the EIS identifies several types of forest stands and provides treatment prescriptions for each type. We agree that many of the prescriptions will benefit hares and lynx e.g., single storied stands without much understory. However, other stands e.g., multi- or single story with >35% Dense Horizontal Cover could not be improved by and would likely be degraded by salvage activity to some degree for hares and lynx.

We recommend that the USFS include a project selection criterion that evaluates the understory and advanced regeneration, and avoids areas that are functioning as quality habitat for lynx/hare. Of particular importance are those areas where current or historic data indicate that lynx are/were present. We believe that this approach will aid the USFS in the design and identification of specific treatment areas that will be most beneficial to lynx and minimize potential disturbance lynx from treatment activities.

OTHER COMMENTS/RECOMMENDATIONS: ROADS AND RECLAMATION

The Forest Service made deliberate and thoughtful decisions with regard to 2010 Travel Management Plan throughout the GMUG. CPW is very supportive of those decisions with the long-term goals of preserving blocks of unfragmented wildlife habitat, and holding big game, particularly elk, on public lands where they are available for harvest by public land hunters. Road density and utilization, vegetation management and recreation management may impact effective use of habitat by mule deer, elk, and other species. Maintaining or reducing road density consistent with the 2010 Travel Management Plan will provide more usable habitat within the treatment area for wildlife.

Our review of the DEIS did not indicate if the designed roads and temporary roads would be closed to the public during active treatment and post treatment restoration and monitoring periods. If left open these routes may impact habitat effectiveness for wildlife.

CPW supports road decommissioning after treatments are completed. If implemented fully as proposed (proposed action), the Forest Service will end up with a net increase of 12 miles of new roads. CPW recommends that the Forest Service adopt a road planning and implementation strategy so that the project achieves an overall no net increase of road miles within the project boundary and treatment areas. Given the limited amount of new roads being proposed, it seems reasonable that the Forest Service could reach that goal.

OTHER COMMENTS/RECOMMENDATIONS:

Recent research conducted by CPW on the wildlife response to habitat treatments has highlighted the need to evaluate and consider domestic grazing system influences on vegetation treatment response. We suggest that the GMUG incorporate and evaluate grazing system management in the analysis area.

Given the economics associated with trucking salvaged logs, CPW understands that the treatment areas will be focused in areas closest to existing mills. We encourage the USFS to select project locations that will have the greatest benefit on regeneration of the forest, public land users, and wildlife throughout the opportunity area in addition to providing economic efficiency.

COOPERATION

CPW appreciates the cooperative nature and collaborative approach to project management that is built into this EIS, specifically at the project implementation stage. CPW staff looks forward to participating in planning, on site visits and when preparing design features. CPW believes close cooperation leads to projects that benefit wildlife and produce effective forest treatments.

Thank you for the opportunity to review the DEIS: SBEADMR. We respectfully offer these comments and recommendations in support of the Forest Service's desire to develop a document that will protect wildlife and its habitat within the GMUG National Forest. We value the opportunity and ability to work with you on this important project. If you have any questions or need clarification on this letter please contact Southwest Regional Land Use Coordinator, Brian Magee at 970-375-6707.

Sincerely,

Patricia D. Dorsey,
Southwest Region Manager

xc: Ron Velarde, NW Regional Manager, Scott Wait, Senior Terrestrial Biologist, John Alves, Senior Aquatic Biologist, Jon Holst, Energy Liaison, Renzo Delpiccolo, Area Wildlife Manager Montrose, J. Wenum Area Wildlife Manager, Brian Magee, Land Use Coordinator, Jake Ivan, Mammals Researcher, SWR File

Attachments: Figure 1. Map; Attachment 1. Colorado Recommended Stipulations for Oil and Gas within the State of Colorado

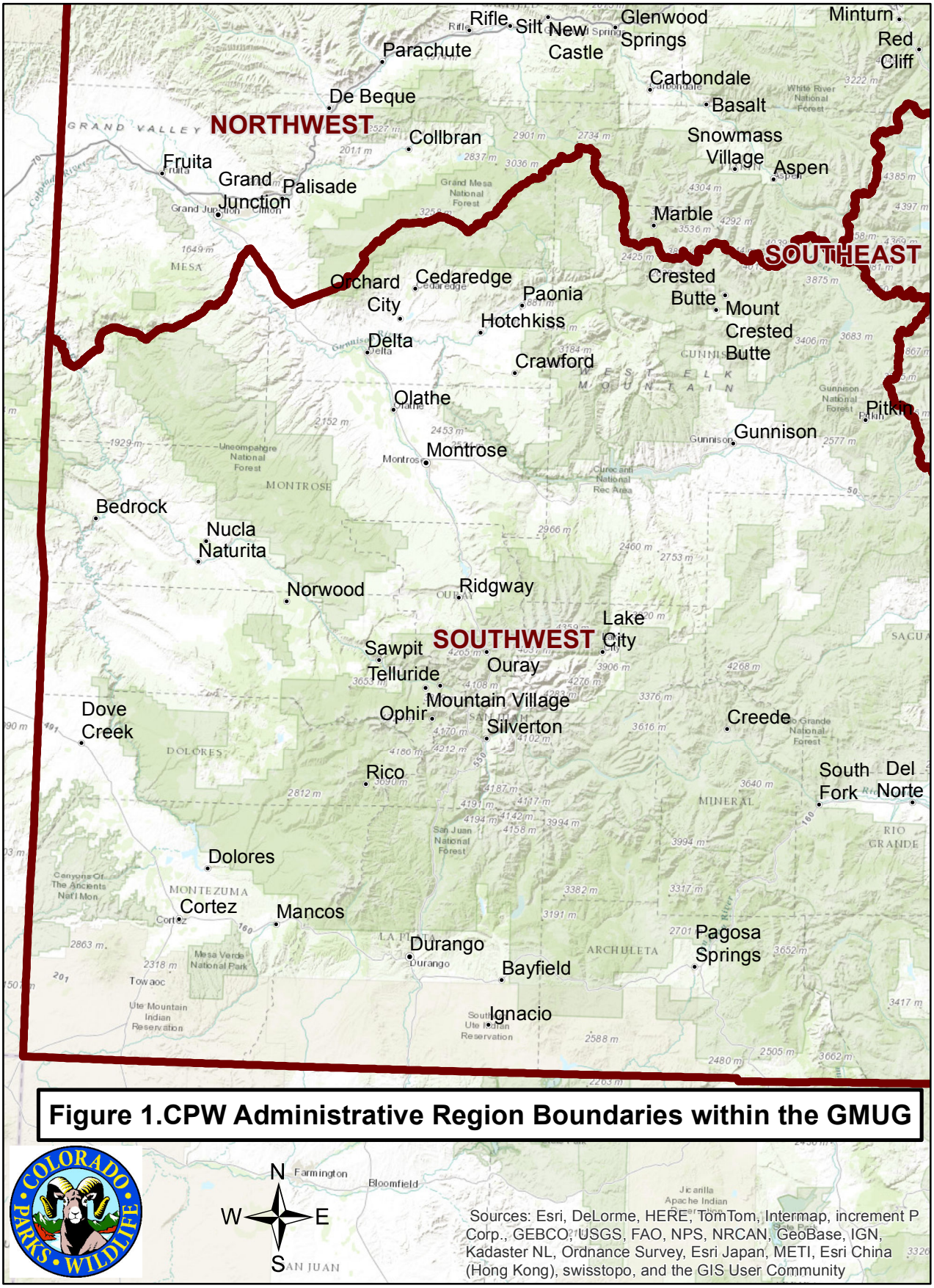


Figure 1.CPW Administrative Region Boundaries within the GMUG

Sources: Esri, DeLorme, HERE, TomTom, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), swisstopo, and the GIS User Community

DELTA COUNTY, COLORADO

BOARD OF COUNTY COMMISSIONERS

COUNTY COURTHOUSE • 501 PALMER STREET • SUITE 227 • DELTA • COLORADO • 81416-1796

PHONE: (970) 874-2100 FAX: (970) 874-2114

www.deltacounty.com

Dist. 1: C. Douglas Atchley - Dist. 2: C. Bruce Hovde - Dist. 3: J. Mark Roeber

July 31, 2015

Scott Armentrout
Forest Supervisor
Grand Mesa, Uncompahgre, Gunnison National Forest
2250 Highway 50
Delta, CO 81416

SUBMITTED ELECTRONICALLY and VIA CERTIFIED MAIL

RE: DRAFT EIS – SBEADMR Project

Dear Scott,

Delta County greatly appreciates the tremendous amount of work you and your staff have put into the SBEADMR project. Delta County has been at the table and worked in partnership with US Forest Service and all of the stakeholders from the onset of the project. We will continue to work through the entire NEPA process, appeal period and adaptive management phases. We commend the GMUG Forest for making this a template of how to treat large landscapes and address real safety concerns and continuing to provide for multiple use industries on our forestlands.

The following comments are specific to the Draft EIS (DEIS) for the SBEADMR Project. The DEIS proposes a proactive 8-12 year approach to move the GMUG to a healthier natural state, enabling the use of dead timber while the timber still has a market value and improving the safety of areas surrounding roads, campgrounds and trails. We thank the GMUG and other Forest Service staff for the tremendous amount of work to provide significant public participation, increase the level of understanding and for keeping science at the basis for decision making.

We encourage the adaptive management phase of the project to keep the science at the core of the decision making and not the "published work of the week." In addition, we encourage the GMUG to continually stress the participatory model in the action part of the adaptive management.

We commend the Forest Service for maintaining a relatively consistent acreage total for the treatment in the alternatives. Delta County requests that these acreage targets be maintained throughout the entire NEPA and implementation process. We support Alternative 2, the preferred alternative with the caveat that additional salvage treatments from Alternative 4 are added per resource needs, and that our comments are considered and incorporated into the selected alternative. Specifically, Delta County would ask that the 21,000 ccf of salvage timber from Alternative 4, the Salvage Alternative, with the resiliency and salvage timber already included in Alternative 2, the Preferred Alternative. This would add additional safety precautions in several of the previously identified WUI areas and objectives and add flexibility to respond to changing conditions on the ground. Data previously obtained for historical timber projects indicate that adding additional salvage timber to Alternative 2 would provide 332 jobs to those already detailed in the preferred alternative. Delta County has lost 500 coal mine jobs in the last two years and this job boost would help bridge our current deficit in good paying jobs for families in the area.

The rate of spruce beetle mortality and standing dead will clearly outpace this project and therefore the additional evidence that adding additional salvage to the preferred alternative is the right science on the ground for the safety of our county residents and visiting tourists. The priority for the first five years should be to remove the trees that are marketable and not delay sales in the name of process. Delta County cannot stress enough our support of additional treatment acres as this also assists the GMUG in ensuring the safety of firefighters as these forests will burn and the professional should not be put at risk because of aesthetics. Therefore we request revisions to Hazard Tree Removal as outline on page 45. Revised language should specify that mechanical and non-mechanical fuels management activities shall be conducted within a half mile buffer of roads open to the public and other identified infrastructure. This is necessary for firefighter and public safety.

Resiliency is often touted as a reason to tackle forest health issues as it should for long term sustainability. The resiliency language should be highlighted in the EIS given the emphasis and science that it received in the SBEADMR Science symposium and numerous conversations. It is buried in the DEIS and should be highlighted.

Visually sensitive areas are also ever changing and we encourage the GMUG to not automatically remove them from mechanical treatment consideration. This is especially true for aspen areas where treated areas have been proven to be more resilient to aspen decline. Visually sensitive areas should be considered during the adaptive management and monitoring process and not taken of the table from the onset. Forest management is a focused way of achieving age class diversity even in beetle infested environments and should clearly be a goal in the aspen response due to the importance of aspen habitat. Age diversity management is the long term solution to maintaining certain visually sensitive areas.

Delta County would encourage that the socio-economic portion be further delineated to pull out the 10 counties within the GMUG. To rely on IMPLAN for 22 Counties does not accurately reflect the smaller operators and jobs. Socio economic goals for Delta County include:

- to protect the existing jobs and the companies that provide them;
- to help increase economically-sustainably capacity in service work;

Delta County believes that the preferred alternative with the additional salvage timber sales will provide sustainable jobs and industry for our areas while maintaining the aesthetic wilderness landscapes that are right out our back door.

Delta County takes exception to the DEIS when it states that "County road maintenance could result in additional impact to individual such as crushing, or removal by road maintenance equipment." (Page 219). Delta County works cooperatively with the GMUG on several roads, culvert projects and other special areas most notably the County Line Parking area for cross country skiers and recreationists. The work conducted by Delta County adheres to the same standards as the Forest Service road contractors and our Road and Bridge department is fully capable of performing high quality work. Delta County requests that this be removed from the DEIS.

Delta County requests that a formalized stakeholder group be formed to continue the informed public involvement that addresses the economics, science and adaptive management phases of the SMEADMR project. The stakeholder group should reflect a balance of the multiple uses interests of the entire GMUG area and counties. The stakeholder process must truly be an active participatory going forward and we look forward to working with all stakeholders.

Sincerely,
Delta Board of County Commissioners

J. Mark Roeber, Chairman **C. Douglas Atchley, Vice Chairman** **C. Bruce Hovde, Commissioner**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8
1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

Ref: 8EPR-N

Scott Armentrout, Forest Supervisor
Grand Mesa, Uncompahgre, and
Gunnison National Forests
2250 Highway 50
Delta, Colorado 81416

Re: Draft Environmental Impact Statement for the Spruce Beetle Epidemic and Aspen Decline Management Response Project; CEQ # 20150151

Dear Mr. Armentrout:

The U.S. Environmental Protection Agency Region 8 has reviewed the U.S. Department of Agriculture Forest Service's (USFS's) Draft Environmental Impact Statement (EIS) for the Spruce Beetle Epidemic and Aspen Decline Management Response Project (Project). The USFS Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forests propose to proactively and adaptively respond to declining forest conditions that have resulted from large-scale insect and disease outbreaks by promoting recovery from the insect outbreak, improving the resiliency of green stands to future disturbances, and providing for human safety. Our review was conducted in accordance with the EPA's responsibilities under section 102 of the National Environmental Policy Act (NEPA), and Section 309 of the Clean Air Act (CAA).

Project Background

The Project proposes to treat spruce and aspen forests impacted by the ongoing spruce beetle epidemic and sudden aspen decline (SAD), as well as areas identified as high risk across the GMUG National Forests that are located on the western slope of the Rockies and into the Colorado Plateau. Of the 3,161,900 acre range, the GMUG has experienced approximately 223,000 cumulative acres of spruce beetle mortality and 229,000 acres of affected aspen over the past decade. The Project's adaptive and integrated approach will be applied at the landscape level to define opportunity areas available for treatments, priorities for treatment, parameters and design features, operating protocols, monitoring and activity tracking. The primary tools for reducing tree mortality, safety threats and fire hazard in stands already experiencing beetle-induced mortality will be the removal of dead and dying trees. Forest resiliency will be addressed under some alternatives in threatened stands by reducing stand densities. Aspen stands may be identified as candidates for regeneration treatments. Management tools may include one or more of the following: commercial harvest; non-commercial treatments (mechanical and prescribed fire); recovery and resiliency treatments; hazard tree removal; and reforestation. Temporary and/or designed road construction will likely be necessary.

Although landscapes of various extent are identified as opportunity areas and analyzed under the action alternatives in the Draft EIS, the USFS is proposing treatments for a maximum of 120,000 acres under all action alternatives over the approximate 8-12 year implementation period of the Project. In addition to the No Action alternative, three action alternatives are identified. Alternative 2 (Proposed Action)

includes a total of 718,000 opportunity acres where commercial, non-commercial and mechanical and prescribed fire treatments could be implemented. Commercial treatments on suitable timber production areas would be largely limited to the identified 24 focus Lynx Analysis Units (LAU), while non-commercial treatments would be primarily focused outside of suitable lynx habitat. Alternative 3 (Public Safety Focus) limits the geographic extent of treatments exclusively to the wildland urban interface (WUI) and outside the WUI, proximal to roads and additional human infrastructure, for a total of 426,000 opportunity acres. Alternative 4 (Spruce Salvage) limits spruce treatments to salvage only, and aspen treatments would be the same as Alternative 2. The potential treatment area would be the same as Alternative 2 (718,000 acres), except commercial mechanical treatments would also occur in areas outside of the 24 identified focus LAUs, resulting in an additional 50,000 acres available for commercial treatment opportunities compared to Alternative 2.

Comments and Recommendations

Our comments on the Draft EIS focus on whether there is sufficient information to determine impacts when site-specific treatment locations are not identified at this point in the NEPA process. Where impacts cannot be predicted, it is imperative that safeguards are in place such as the design features, best management practices (BMPs) and adaptive management frameworks. In some instances we understand that projecting potential impacts may be difficult without site-specific information. However, there may be information currently available that would be beneficial to include in the Final EIS to provide for a more robust analysis. Our concerns and/or recommendations are primarily related to potential impacts to aquatic resources, including fens, as well as the air resources analyses.

1) Aquatic Resources

The area includes aquatic resources having high Watershed Condition Class scores and hydrologically dependent riparian areas and wetlands including fens. The EPA considers protection of aquatic resources to be among the most important issues to be addressed in the NEPA analysis for vegetation management activities. As outlined in the Draft EIS, most treatments contemplated under the action alternatives (e.g., tree removal, thinning, road construction) have the potential to adversely impact aquatic resources, including surface and ground waters, wetlands, streams, riparian areas, and their supporting hydrology.

Watersheds: The GMUG reclassified Watershed Condition Class as part of a 2011 national effort. We understand that the USFS bases watershed condition on a 12-indicator model that considers both aquatic and terrestrial physical and biological indicators. The Draft EIS explains that a watershed is considered to be functioning properly (Class 1) if the physical attributes are appropriate to maintain or improve biological integrity (i.e., the watershed is functioning in a manner similar to natural Wildland conditions). Class 2 and Class 3 watersheds have impaired function because some physical, hydrological, or biological thresholds have been exceeded. According to the Draft EIS, the GMUG includes 231 watersheds. There are 156 Class 1 (functioning properly) watersheds, 75 Class 2 (functioning at risk) watersheds, and no Class 3 (impaired function) watersheds in the area. Of the 156 Class 1 watersheds, 51 are borderline Class 1/Class 2. Additionally, 212 of the 231 watersheds in the GMUG include state delineated Source Water Areas. These areas are managed for multiple use outputs while providing protection of water quality to meet municipal water supply needs.

Recommendations

The Draft EIS states that it is unlikely that proposed treatments will result in a change in Watershed Condition Class score. Surveys will identify areas of concern to be avoided, such as fens or wetlands, and effects tracking will evaluate potential adverse or beneficial effects of the proposed treatment. If

treatment-specific surveys indicate that the treatment could move the watershed toward a more impaired condition, the proposed treatment may be modified and monitoring will be conducted.

Appendix B includes project design features to assist with water quality and soil productivity objectives to protect watershed resources. Appendix C includes the Pre-Treatment Checklist, with the first planning step being identification of priority watersheds for treatment. We support the USFS's intent to modify treatment as needed to avoid increasing impairment of watershed conditions as outlined under the soil and water surveys. However, the instructions lack additional detail for modification prescriptions. To the extent practical, we recommend including information in the Final EIS detailing treatment option approaches. We recommend the Final EIS more specifically identify potential project impacts and the treatment options available to prevent further degradation and reach watershed health objectives if project design features and BMPs fail, such as those outlined in Appendix B and Table 15. Additional information could include an expanded list of adaptive management options to address situations when monitoring does not indicate progress toward desired conditions as outlined in our scoping comments. For example, it may be necessary to consider larger buffers than usual around wetlands, streams and lakes during treatments.

Wetlands/Riparian Areas/Fens: There are approximately 128,019 acres of riparian areas including floodplains within the GMUG, with 20,671 acres of riparian areas occurring within opportunity areas. The USFS manages springs as a subset of wetlands due to their unique characteristics and importance to groundwater dependent ecosystems. Of the approximately 508 springs within the GMUG, 235 are within opportunity areas. Additionally there are approximately 8,071 acres of fen and associated wetlands within the GMUG; the Draft EIS states that nearly all are within opportunity areas. As outlined in the Draft EIS, fen communities are very sensitive to hydrologic alternations and restoration is extremely challenging once function has been impaired. Due to the slow rate of accumulation of peat in fens, these ecosystems are generally considered to be irreplaceable. In addition, there appears to be eight sensitive plant species on the GMUG known to occur in fens.

The wetlands typically found in mountain environments represent highly valuable upper montane and lower subalpine wetland ecosystems performing a variety of functions and values. The Executive Order 11990 – Protection of Wetlands (May 24, 1977) requires federal agencies to avoid to the extent practicable, long- and short-term adverse impacts associated with the destruction or modification of wetlands.

Fen wetlands provide important hydrological and water quality functions by improving water quality in headwater streams and may support rare assemblages of aquatic invertebrates. They also provide critical ecological functions such as providing base flows to streams during late summer and/or drought periods. The U.S. Geological Survey has also determined that peat wetlands are especially efficient filters of metals dissolved in groundwater and surface water. The capacity to filter metals contributes to improved water quality by lowering dissolved metal content in streams (Owens, D.O., and Breit, G.N., 1995), which is particularly relevant to the project area regarding the water quality standard (WQS) exceedances related to metals concentrations discussed below.

Recommendations

The Draft EIS (p. 88) states that "There are at least 8,071 known fens within the GMUG and nearly all are within opportunity areas." However, Table 13 (p. 87) identifies 3,073 acres of the total 8,071 acres are within opportunity areas. In addition, page 205 references a total of 11,034 acres of fens estimated within the GMUG, with 81% rated in "high" condition. We recommend this information be checked for consistency and clarified throughout the Draft EIS. Regardless, the acreage within this range is

substantial.

The EPA recognizes fen-type wetlands as ecologically critical in that they provide local and regional biodiversity. The U.S. Fish and Wildlife Service (USFWS) designated fen wetlands a Resource Category 1 with respect to the USFWS Peatland Mitigation Policy. The mitigation goal of USFWS Resource Category 1 is no loss of habitat values and the Peatland Mitigation Policy places the protection and avoidance of fen wetlands as a priority during CWA Section 404 reviews. Further underlying the uniqueness and importance of fen wetlands in Colorado, the Corps revoked the use of Nationwide Permits in fen wetlands to protect this unique wetland type. In the EPA's view, these wetland ecosystems are, for all practical purposes, non-renewable and irreplaceable. Therefore, in accordance with the goal of no overall net loss of the nation's remaining wetland base for the Section 404 regulatory program, we strongly recommend that both direct and indirect impacts to these highly valued resources be avoided.

Because of the irreplaceable nature and rarity of montane fen wetland ecosystems, compensation for these wetland impacts is extremely difficult. The Draft EIS states that Forest Service policies and BMPs nationally and regionally severely restrict any activities in wetlands (including fens) and limit activities in the water influence zone (WIZ) around them, and as a result, activities associated with implementing this project will avoid fens. Although there are established design criteria, including buffers around fens and associated wetlands so that the use of mechanical equipment and proposed treatments are restricted in WIZs to protect habitat and functions (Draft EIS p. 88, Table 14), this does not appear to necessarily apply to roads. According to the Draft EIS, proposed roads would be located outside of fens and wetlands, and to the extent feasible, WIZs (p. 98). WIZs include riparian areas, floodplains and depressional recharge areas, and are some of the most ecologically diverse habitat types that provide bank stability, sediment filtering, streamside shading and nutrient input into streams and lakes (Draft EIS p. 88). We therefore recommend the Draft EIS clarify whether the placement of roads will be subjected to the same buffer zones as mechanical equipment in relationship to the water resources listed in Table 14, and advocate that roads also be located outside of WIZs to reduce adverse impacts to these hydrology supporting aquatic ecosystems. Road cuts can potentially intercept groundwater that supports fens. Finally, we support the USFS's efforts to potentially move some existing roads located within the WIZs or other sensitive areas, and employ improved erosion control measures to reduce impacts to riparian areas and provide a beneficial effect to watersheds.

Water Quality: The Draft EIS briefly mentions that the State of Colorado identified segments in 21 streams totaling approximately 141 miles that do not meet water quality standards within the Forests' boundaries, generally due to metals concentrations. The Draft EIS states that proposed treatment activities are unlikely to affect the specific impairments in the identified waterbodies, and that design features and BMPs will be used to minimize the potential to adversely impact other water quality parameters, such as sediment, turbidity and temperature.

Recommendations

Although the Draft EIS references the project file to find a list of the impaired streams and their beneficial uses, we recommend that these details be included in the Final EIS. Currently the limited information contained in the Draft EIS is not sufficient to understand baseline conditions, including the specific delineation of mine-induced impaired waters versus those waters with impaired water quality parameters that are more at risk for project impacts (e.g., temperature, dissolved oxygen, pH, sediment, turbidity). We recommend that the Final EIS include Clean Water Act (CWA) Section 303(d) listed waterbodies that are within the GMUG, including any occurring within opportunity areas, and more specifically identify potential project impacts along with specific design features and BMPs that will be

used to avoid or minimize these impacts. Proposed road locations, especially stream crossings, and treatment activities could exacerbate impaired conditions.

We recommend that the Final EIS analyze potential impacts to surface waters related to erosion and sedimentation from land disturbance and stream crossings, as well as potential impacts associated with project treatment activities. We also recommend that the USFS (a) analyze potential impacts to impaired water bodies within and/or downstream of the planning area (including water bodies listed on the most recent EPA-approved CWA § 303(d) list), and (b) coordinate with the Colorado Department of Public Health and Environment (CDPHE) if there are identified potential impacts to impaired water bodies (in order to avoid causing or contributing to the exceedance of water quality standards). Where a Total Maximum Daily Load (TMDL) exists for impaired waters in the area of potential impacts, pollutant loads should comply with the TMDL allocations for point and nonpoint sources. Where new loads or changes in the relationships between point and nonpoint source loads are created, we recommend that the USFS work with CDPHE to revise TMDL documents and develop new allocation scenarios that ensure attainment of water quality standards. Where TMDL analyses for impaired water bodies within or downstream of the planning area still need to be developed, we recommend that proposed activities in the drainages of CWA impaired or threatened water bodies be either carefully limited to prevent any worsening of the impairment or avoided where such impacts cannot be prevented. We recommend that mitigation or restoration activities be considered in the Final EIS to reduce existing sources of pollution, and to offset or compensate for pollutants generated.

In much the same way as Figure 15 illustrates watershed condition classes and fen/wetland locations in the Draft EIS, we recommend that the Final EIS include a map identifying the locations of the impaired streams in relationship to the project area. This additional information will enable stakeholders to more fully understand the potential for impacts from this landscape approach project.

In addition, for streams with a coldwater designation, we recommend consideration of specific measures to reduce impacts to stream temperature. Such measures may include limiting removal of trees in areas where no other trees or shrubs provide stream shading along with tree planting or cattle exclosures designed to restore vegetative shade to impacted streams.

Design Features, BMPs, and Adaptive Implementation and Monitoring: We support the efforts of the USFS to avoid and minimize impacts through design features and BMPs. We also support the adaptive implementation framework developed to define treatment locations and design, define monitoring questions, require annual monitoring review and evaluation of treatment effects, and adjust management towards desired conditions throughout the project implementation period. We recommend expanding protective measures to include the following:

- Develop design criteria and/or mitigation measures to protect reservoirs, particularly if treatments could occur adjacent to these important resources. Such measures may include operational requirements for treatments implemented directly adjacent to reservoirs and/or monitoring impacts to reservoir water quality from project activities.
- Specify steps to protect range improvements (fencing, exclosures, etc.) that protect water quality and habitat.

2) Air Resources Analyses

We appreciate that many of our scoping recommendations related to air resources were addressed in the Draft EIS. Please see our remaining comments and recommendations below.

Air Quality Modeling: The Draft EIS references the U.S. EPA's Motor Vehicle Emissions Simulator as MOVES2014b that was used for generating equipment emissions factors in the analysis. Please note that there was an earlier version of this model called MOVES2010b. However, the most recent version is MOVES2014. Please clarify in the Final EIS which version was used for the analysis. Although MOVES2010b can currently be utilized for NEPA purposes since it's within the 2-year grace period of the release date, the latest version of MOVES2014 is recommended for new projects coming online as it includes updated information helpful for analysis.

Greenhouse Gas (GHG) Emissions and Climate Change: We appreciate the discussion of climate change and the inclusion of GHG emissions inventories in the Draft EIS. We note that the exact locations for treatments have yet to be determined, and the Draft EIS states that net effects of the project on greenhouse gases is unknown given carbon sequestration from forest regeneration and vegetation growth. The Draft EIS references the Council on Environmental Quality (CEQ) December 2014 Revised Draft Guidance for Federal Agencies' Consideration of GHG Emissions and Climate Change. We believe the Draft Guidance offers a reasonable approach for conducting analyses of GHGs and climate change impacts. This approach allows an agency to present the environmental impacts in clear terms and with sufficient information to make a reasoned choice between the no-action and alternatives and mitigation. We note that the Draft EIS compares the GHG emissions to state and national emissions; we believe this approach does not provide meaningful information for a planning level analysis. We recommend that the NEPA analyses provide a frame of reference, such as an applicable federal, state, tribal or local goal for GHG emission reductions, and discuss whether the emissions levels are consistent with such goals.

3) Other Considerations

Site-Specificity of Analysis: To the extent possible, we recommend including as much site-specific project information in the NEPA documentation that is known at the time of the Final EIS. This would include maps of specific locations identified for various types of treatments, including prescribed fires and landscape thinning, so that project effects would be more accurately analyzed. This may assist with minimizing the risk of future NEPA documentation if it's necessary to revise the analysis based on changes in project design. At a minimum, we recommend that the Final EIS include maps that specify these types of treatments in opportunity areas.

Preferred Alternative: The Draft EIS does not identify the lead agency's Preferred Alternative. As required under Section 1502.14 of the Council on Environmental Quality's Regulations for Implementing the National Environmental Policy Act, unless another law prohibits expression of such a preference, the Preferred Alternative will need to be identified in the Final EIS. This will ensure that the public will have an opportunity to comment on the selection of the Preferred Alternative during the Final EIS review rather than through the USFS objection processes. Although lead agencies are not required to analyze the final decision on an alternative (i.e., per the ROD), it seems reasonable and judicious to include such an analysis in the Final EIS if the draft decision is known at that time. We recommend that the USFS' Preferred Alternative is clearly described in the Final EIS, or an explanation be provided as to why it is not identified.

Special-Status and Threatened and Endangered Species: The project area may contain special status species, including Endangered Species Act listed threatened species, endangered species, and/or their designated critical habitat, as well as candidate species. These include Gunnison sage-grouse, Mexican spotted owl, Southwestern Willow Flycatcher, Yellow-billed cuckoo, Uncompahgre Fritillary butterfly, Black-footed ferret, and the Canada Lynx. We recognize that the USFS will discuss the Preferred Alternative if it differs from the currently proposed action alternatives with the USFWS as it relates to potential impacts to these species if present in the project area. To best inform the decision-maker and

the public, we recommend the NEPA documentation include any USFWS recommendations to reduce potential impacts to these species including project design criteria, mitigation, conservation measures and monitoring measures. The results of the USFWS discussions and subsequent recommendations will be a valuable addition to the Final EIS.

Closing

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed Project, the EPA is rating the Draft EIS as Environmental Concerns – Insufficient Information (EC-2). The "EC" rating indicates that the EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The "2" rating indicates that the EPA has identified additional information, data, analyses, or discussion that we recommend for inclusion in the Final EIS. Because a Preferred Alternative was not identified in the Draft EIS, each of the action alternatives are receiving an EC-2 rating (we do not rate the no action alternative). A description of the EPA's rating system can be found at: http://www.epa.gov/compliance/nepa/comments/ratings.html.

Although the action alternatives received an EC-2 rating in this review, we do not view them as equivalent based on the Draft EIS analysis. As outlined above, the opportunity areas increase in size from Alternative 3 to Alternatives 2 and 4. In Alternative 3, fewer roads would be constructed than in Alternatives 2 and 4. Alternative 3 has a maximum potential estimate of 70 miles of temporary roads and 10 miles designed roads compared to Alternatives 2 and 4 that have 260 and 60 respectively; Alternative 4 has the highest potential for dispersal of road impacts due to the larger affected landscape for commercial treatments. Consequently, Alternative 3 would have reduced effects to water resources compared to Alternatives 2 and 4, and Alternative 4 would have increased effects compared to Alternative 2. Regarding fen wetlands, Alternative 3 would include the fewest number of fens or other wetlands, where Alternative 4 has the potential to include the greatest number of fens and other wetlands within commercial treatment areas. Commercial mechanical treatment is restricted to suitable timber lands, which is on slopes <40%. This increases the chance for conflict with fens and wetlands, which occur on shallower slopes.

We appreciate the opportunity to participate in the review of this project, and are committed to working with you as you prepare the Final EIS. If we may provide further explanation of our comments during this stage of your planning process, please contact me at 303-312-6704, or your staff may contact Melanie Wasco, Lead NEPA Reviewer, at 303-312-6540.

Sincerely,

Philip S. Strobel
Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

Gunnison County
COLORADO

Gunnison County Board of County Commissioners
Phone: (970) 641–0248 • Fax: (970) 641–3061
Email: bocc@gunnisoncounty.org • www.GunnisonCounty.org

July 28, 2015

Scott Armentrout, Forest Supervisor
Grand Mesa, Uncompahgre, Gunnison NF
Attn: SBEADMR
2250 Highway 50
Delta, Colorado 81416

www.fs.usda.gov/goto/SBEADMR_comments
Submitted Via Electronic Mail and Certified Mail

Re: Draft EIS- Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR)

Dear Mr. Armentrout,

Gunnison County appreciates the opportunity to provide formal comments and feedback on the Draft-EIS for the Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR) Gunnison County has been actively involved in the Public Land Partnership (PLP) working group and thanks you for the opportunity and forum that has allowed county government, conservation groups and industry along with the forest service and other interested parties the opportunity to delve deeper into the complexities and the challenges in responding to these major events occurring across our treasured landscapes.

Based on our participation with the PLP working group and our review of the draft EIS please consider our comments and input in your decision making. Gunnison County has consistently looked for balance in the decisions and input we give to land use and public land management issues. We believe that natural resource development and resource protection can be balanced, especially when a wide variety of input is sought and included in final decisions. From there we can move forward with decisions that have strong buy in built upon consensus and forged through compromise.

Gunnison County supports Alternative 2- the Proposed Action. We feel that it allows the most opportunity while safeguarding important areas and species of concern. We value that public safety is a focus in both the Wildland Urban Interface (WUI) as well as other areas that present high values in use, such as the protection of roads, utility corridors, communication sites, dispersed recreation sites, developed campgrounds, ski areas as well as other infrastructure. We also appreciate that certain areas are off limits to treatments and harvest and that the protection of Lynx habitat as well as other wildlife factors have been considered. Additionally, the protection of wetlands, wilderness, road less and steep slope areas are accounted for in the proposed action. Furthermore, the preferred option considers and addresses issues around fire concerns. As we all know, 120,000 acres (projected maximum combined treatments of the project) will not be enough to eliminate fire possibilities or be a huge game changer in the long term fire danger. With that in mind, we do believe that the proposed actions strategic treatments will allow firefighters a better opportunity to manage eventual fires for resource benefit.

Scott Armentrout, Forest Supervisor
RE: Draft EIS – Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR)
7/28/15

The following is a list of thoughts on specific items or issues we feel can and should be considered in the final plan.

- Time is of the essence. We believe that due to the lifespan of dead/dying trees, the commercial treatment opportunities need to be developed and deployed as quickly as possible. We expect that all the necessary regulations be met, but know that the resource as a product does have a timeframe to its value.
- We encourage the project to work toward its goal of 120,000 acres of treatments. Of the 718,000 opportunity acres and in the scale of the whole GMUG this is a small percentage of the landscape but as stated above it provides opportunity for increased safety, protection of infrastructure and a potentially positive economic impact in our county.
- Although the 120,000 acres is proposed as 60,000 acres of commercial mechanical treatments and 60,000 acres of noncommercial mechanical and prescribed fire treatments, we would suggest that it is more important to use the best and most productive treatments as necessary and available. We support the cap of 120,000 acres but realize that adaptive management might suggest that the 50/50 split between commercial and noncommercial could actually lessen the overall impact of the project.
- The 300' buffers (600 feet total) might not be potentially large enough in some areas based on the fire behavior that was observed in the South Fork Complex Fires. While we understand that this buffer was chosen to coincide with travel management plans on the GMUG, we would ask that you utilize your expertise to determine if indeed these buffers are sufficient to be useful based on the unprecedented fire behavior exhibited on the GMUG in recent years.
- If noncommercial treatments produce viable firewood product that will be burned in slash piles we ask you consider the opportunity for community members to access and utilize this valuable resource. This would still require a forest service wood cutting permit but by mapping and allowing access to this product it creates revenue for the USFS and makes easier the collection of this resource in the local communities. We feel this is a good opportunity to allow better awareness of the stewardship and work taking place on our public lands and connect the communities to the issues of forest health.

Again, we thank you for the opportunity to comment on the Draft-EIS and the partnership we have with the GMUG. Although this is a time of great change on our landscape we also feel this is an opportunity for great change in how communities, counties, conservation groups and industry, along with the forest service, can be collaborative partners in stewardship and forest health over the course of time. Please feel free to contact the Gunnison Board of County Commissioners for any clarification of these comments or for further discussion.

Best Regards,

Paula Swenson, Chairperson | Phil Chamberland, Commissioner | Jonathan Houck, Commissioner

Hinsdale County
311 N. Henson Street
P.O. Box 277 • Lake City • Co 81235

Fax: (970) 944-2630
Email: hcadministrator@centurytel.net
www.hinsdalecountycolorado.us

HinsdaleCounty
COLORADO
Relax • Recharge • Rediscover

July 30, 2015

Scott Armentrout, Forest Supervisor
Attn: SBEADMR
2250 Highway 50, Delta, CO 81416
http://www.fs.usda.gov/goto/SBEADMR_comments

Dear Mr. Armentrout:

Thank you for the opportunity to comment on the Draft EIS for the SBEADMR Project. This project is an important step towards restoring forest health and resiliency while improving public safety for local communities, visitors and firefighters. Our comments are in no way exhaustive, however, they represent some primary concerns as well as general attitudes that the Hinsdale County Board of Commissioners has in regards to this project.

Introductory remarks

The mission of the United States Forest Service is to "sustain the health, diversity and productivity of the Nation's forests and grasslands to meet the needs of present and future generations." This mission statement fits well with the overarching concern of our Board of County Commissioners, which is the health, safety and welfare of our citizens. The SBEADMR Project, especially Alternative 2 (with additional salvage from Alternative 4 to increase cost-effectiveness and treatment of increased volumes of dead and dying timber), fulfills this mission statement.

Hinsdale County is home to much public land including the GMUG, Rio Grande, and San Juan National Forests, as well as BLM. With 96.5% public land, our County is in a unique position to comment on forest health. In addition, Hinsdale County has experienced two catastrophic wildfires in recent years, the Little Sand Fire in 2012 and the Papoose Fire (part of the West Fork Complex) in 2013. The nature and behavior of the West Fork Complex Fire re-wrote fire behavior due in part to the spruce mortality in the fire area. There was damage to air quality, water quality and critical habitat as well as risk to property and lives. Much of the forested areas in our county are still greater than 90% standing dead spruce, a result of the beetle epidemic, drought conditions and overly-dense forests. Hinsdale County supports treatment of our forests in general, and the GMUG in particular, to mitigate the current dangerous

conditions, bring greater resiliency to the forest, protect watersheds, protect air quality, protect critical habitat, and begin the process of restoring forest health. We see SBEADMR and our supported alternative as a means to accomplish these desired outcomes.

In the last few decades, the forests have changed and we believe that the management of our forests must attune to the times. Even though this project treatment area is only 4% (maximum 120,000 acres) of the GMUG, it is still a good beginning to the process of bringing our forests back to health. The fact that we have a local market for recently dead and affected spruce/fir provides a rare opportunity to perform necessary treatments at a greatly reduced cost. We urge the Forest Service to move quickly to utilize commercial salvage treatments while timber is still merchantable. Addressing this forest-wide issue will require a full suite of treatment options including commercial and non-commercial methods.

Specific Comments

The purpose and need for SBEADMR is inherently obvious. The spruce beetle has killed over 90% of the spruce in the GMUG within Hinsdale County. Along with the use of prescribed burning, the BOCC strongly urges the use of mechanical means to reduce fuels in the forest and avoid the risk to lives as well as the air quality, water quality and critical habitat damage from a wildfire. We also agree with the Forest Service that selected treatments will actually accelerate regeneration in affected areas.

With Proposed Alternative 2, the total treatment area is described as 4% of the entire GMUG. While this is an important first step, Hinsdale BOCC urges the GMUG to go no smaller. In truth, our county wishes the project were larger. We live in the midst of a dangerously at-risk forest and, even with a significant response, time is not on our side. We MUST begin and begin quickly to vigorously mitigate fuels at a rapid pace to, hopefully, reduce the risk to people, vital infrastructure, and our environment. The most effective method to move towards forest health in the current situation is to quickly move towards commercial treatments. More commercial treatments will increase effectiveness as well as decreasing cost and therefore is a common-sense tool. Due to the limited window of merchantability for desirable timber, we request that the Forest Service prioritize preparation and implementation of commercial treatments.

Protection of the health, safety and welfare of our people, protection of vital infrastructure, and firefighter safety and ability to safely fight a fire are paramount in reviewing this process. In the Treatment section (p-45), these issues are discussed. We agree with these priorities, however, fire experts at the Papoose Fire (part of the WFCF), indicated that due to the extreme and unpredictable fire behavior we are seeing in beetle affected forests, a 300 YARD distance is a more realistic fire break than 300 feet. With the flame lengths seen in that fire, and with the safety of firefighters in mind, it would be worth considering expanding that distance. Therefore,

we request that the Forest Service expand the area of hazard tree removal and fuels reduction around infrastructure to a minimum of 300 yards. The same applies to fire breaks.

Mechanical treatment (p-46) exclusions seem to include "visually sensitive areas". We think that standing dead trees are more offensive to the viewshed than treated areas where regeneration is being allowed to occur. It is anecdotally noted that, in areas where severe timbering was done decades ago, there are healthy trees today. Removal of the standing dead trees will allow for advanced regeneration and a forest that will be more resilient and healthy. For this reason, we request that the Forest Service not limit mechanical treatment in "visually sensitive areas".

In Hinsdale County, timbering has begun on Slumgullion Pass. This hazard tree removal not only protects the only escape route from the population center of the county (Lake City), it has also enhanced the viewshed. We are no longer driving through a tunnel of dead trees; instead, we are seeing the living trees that are left and also the vistas that were blocked by DEAD TREES.

Adaptive management as described on p 38-39 and in Appendix E, will provide needed flexibility without sacrificing adequate oversight. We particularly appreciate the public involvement addressed. The Hinsdale County BOCC believes that the "stakeholders" involved in monitoring should actually be stakeholders. In other words, the groups should be composed of members from GMUG counties. Those impacted the most have the greatest true "stake" in the results.

Conclusion

As a county impacted in a major way by forest health issues, the Hinsdale County BOCC viewpoint should be considered seriously as Hinsdale County is living with impacted forests, has lived with two catastrophic wildfires, and is home to three watersheds in need of fire protection. We, as responsible elected officials, cannot allow the status quo to continue. We see this project as a first positive step in restoring our forests and protecting values at risk.

To sum up:

-Effective forest management requires the ability to rapidly adapt to changing conditions. When combined with the adaptive management proposed in the DEIS, regulatory requirements of the USFS are more than adequate to protect the environment as forest health and resiliency are pursued.

-The urgency of this situation in our forests demands that the quickest remedy be applied. Commercial treatments offer the most effective fuel reduction leading to healthy, resilient forests in the most expeditious way. As we anticipate future wildfires (not if, but when), these

treatments should include fire breaks, adequate space for firefighting staging, and escape route protection to assure the health, safety and welfare of the public.

-SBEADMR could lead the way to improving watershed health, overall forest health, and protection of critical habitat. In order to achieve these goals, the proposed treatment acreages should not be diminished in any way in size or scope.

-Hinsdale County BOCC supports Proposed Alternative 2 (with additional salvage from Alternative 4 to increase cost-effectiveness and treatment of increase volumes of dead and dying timber) including adaptive management of the GMUG.

Thank you for your attention to our comments and for your commitment to forest health.

Respectfully,
Hinsdale Board of County Commissioners

Susan Thompson, Chair

Cindy Dozier, Vice Chair

Stan Whinnery, Commissioner

MESA COUNTY
COLORADO
BOARD OF COUNTY COMMISSIONERS
District 1 - John Justman 970-244-1605
District 2 - Scott McInnis 970-244-1604
District 3 - Rose Pugliese 970-244-1606

P.O. Box 20,000 544 Rood Avenue Grand Junction, Colorado 81502-5010 mcbocc@mesacounty.us Fax (970) 244-1639

July 28, 2015

Scott Armentrout, Forest Supervisor
Attn: SBEADMR
Grand Mesa, Uncompahgre and Gunnison National Forests
2250 Highway 50
Delta, CO 81416

Submitted electronically at:
http://www.fs.usda.gov/goto/SBEADMR_comments

Re: Spruce Beetle Epidemic and Aspen Decline Management Response DEIS

Dear Mr. Armentrout:

Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement (DEIS) for the Spruce Beetle Epidemic and Aspen Decline Management Response project (SBEADMR) on the Grand Mesa Uncompahgre Gunnison National Forest (GMUG). Mesa County supports the prudent use of public lands and resources and has supported previous projects to provide treatments for these issues within the Grand Valley Ranger District. The approach the Forest Service is proposing to deal with these issues appears appropriate.

We are pleased with our long-term cooperative relationship with the Forest Service. Mesa County's memorandum of understanding (MOU) with the Forest Service (FS Agreement No. 13-MU-11020402-008) is an important foundation for this arrangement. It appears many of the issues we raised in our 2013 scoping letter (enclosed) are addressed in the DEIS.

However, we are disappointed to have not heard back from you regarding our request for the opportunity to participate in the EIS as a cooperating agency in that same scoping letter.

Mesa County is supportive of a SBEADMR project moving forward that will:

1. Provide flexibility for the Forest Service to respond quickly and effectively to the beetle infestation and sudden aspen decline (SAD) as it proceeds.
2. Protect the safety of the public and important infrastructure.
3. Provide the best economic return to the local communities.
4. Involve the public and other stakeholders in monitoring and reviewing the status of the project while using the best science and management practices over the course of the project.

We believe a combination of the proposed alternatives in the DEIS can meet these goals as well as the Purpose and Need identified in the DEIS.

Please consider the following comments when proceeding with the Final EIS.

Purpose and Need
Mesa County supports the stated purpose and need for the SBEADMR project. We understand the urgency of the project given the scope and rate of infestation of spruce beetle and SAD on the GMUG National Forest. Multiple-use of our national forests is a critical part of our local economy, culture and quality of life. Ensuring public safety, resilient forests, and a plan to recover commercial products for local industries, in the short and long term, are laudable goals.

Socio-economic Impacts
We are encouraged that there is currently a commercial facility with interest in logging spruce beetle kill on the Grand Mesa Uncompahgre Gunnison National Forest. Implementation of vegetation treatment should begin as soon as feasible to ensure the local industry is able to access the trees needed for their market. Since the project is envisioned to occur over an 8-12 year period, it will be important to have an adequate supply of timber sales ready for the market to utilize. The flexibility built into SBEADMR should allow the market to harvest available trees in an expedited manner.

Adaptive Implementation Approach and the Forest Plan Update
We support the proposed adaptive implementation approach in that it keeps the interested and affected public engaged in meaningful implementation and monitoring of the project while recognizing the need to be responsive to the changing nature and rate of the beetle infestation and SAD. Responsive management using the best science/management practices and input from the public should prove to be beneficial to the forest, all forest users, and the local communities.

Among others, the stakeholders invited to participate in adaptive implementation should include owners of adjacent private property and appropriate federal, state, and local land managers and agencies. Specifically, the annual monitoring should be done in coordination with private landowners, public land managers, Mesa County Road and Bridge Division, Grand Mesa and Unaweep Tabeguache Historic and Scenic Byway Committees and the Grand Junction Visitor and Convention Bureau regarding issues such as timing, noise, dust, and road impacts.

The Forest Service should incorporate any lessons learned from the SBEADMR adaptive management approach into the GMUG National Forest Land and Resource Management Plan (Forest Plan) update scheduled to start later this year. Mesa County requests cooperating agency status on the Forest Plan update.

Roadless Areas
We understand vegetation treatment of the vast acreages of land identified as Colorado Roadless Areas will require separate NEPA processes and are not considered in this project. We encourage the Forest Service to give a high priority to any of these areas that may render treatment of other areas covered in SBEADMR ineffective.

GIS Data
Thank you for providing Forest Service Geographic Information System (GIS) data sets for the maps in the DEIS. We would appreciate receiving the final GIS data for the project when FEIS is released and the ROD signed. Our GIS data is also available to the USFS. Please contact our GIS staff at 970-244-1880 for details.

County Roads
In accordance with the Mesa County Road Access Policy, we require a Notice of Intent (NOI) to access county roads. Mesa County requires an access permit for any new access or change in use of an access to and from county roads. Additional county permits that may be required include: grading, building, and surface disturbance permits for work within county rights-of-way. Mitigation for potential road impacts should be coordinated with any energy development or other heavy vehicle and high traffic projects. This appears especially relevant east of Vega Reservoir and on the Grand Mesa slopes.

Thank you for your consideration of these comments. Please keep us updated on the project.

We would also like a timely response to our request to participate in the EIS as a cooperating agency.

Sincerely,
Mesa County Board of Commissioners

Rose Pugliese, Chair
Board of Commissioners

John Justman
Commissioner

Scott McInnis
Commissioner

Encl: 2013 Scoping letter

cc: Senator Michael Bennet
Senator Cory Gardner
Representative Scott Tipton
Frank Whidden, County Administrator
Patrick Coleman, County Attorney
Pete Baier, County Deputy Administrator of Operations
Keith Fife, County Natural Resource Liaison

MESA COUNTY

BOARD OF COUNTY COMMISSIONERS

District 1 – John Justman (970) 244-1605
District 2 - Steve Acquafresca (970)-244-1604
District 3 – Rose Pugliese (970) 244-1606

P.O. Box 20,000 544 Rood Avenue Grand Junction, Colorado 81502-5010 mcbocc@mesacounty.us
Fax (970) 244-1639

August 29, 2013

Scott Armentrout, Forest Supervisor
2250 Highway 50
Delta, CO 81416

Re: Spruce Beetle Epidemic and Aspen Decline Management Response EIS

Dear Mr. Armentrout:

Thank you for the opportunity to provide scoping comments for the Environmental Impact Statement Assessment (EIS) for the Spruce Beetle Epidemic and Aspen Decline Management Response project. Mesa County supports the prudent use of public lands and resources and has supported earlier Environmental Assessments to provide treatments for these issues within the Grand Valley Ranger District. The approach the Forest Service is proposing to deal with these issues appears appropriate.

We are pleased with the cooperative relationship between the Forest Service and Mesa County. Our Memorandum of Understanding (MOU) with the Forest Service (FS Agreement No. 06-MU-11020402-036) is currently being updated and renewed. We would welcome the opportunity to participate in the EIS as a cooperating agency to ensure Mesa County's active involvement in the project.

Please consider the following comments when proceeding with the Draft EIS.

Roadless Areas
The EIS should include an analysis of alternatives for vegetation treatment within the vast acreages of land identified as Colorado Roadless Areas. If these areas are left untreated, it appears the program could be ineffective. We support an alternative that would provide the quickest and most extensive treatment to the affected areas of the Forest and understand funding may a constraint for this aggressive approach.

Local Regulations
Land use authorizations should stipulate by reference compliance with the regulations of all Federal, State, County and municipal laws, ordinances or regulations that are applicable to the project.

Certain sections of the Mesa County Land Development Code may be applicable including the following: (The entire Land Development Code is available on the internet at: http://www.mesacounty.us/planning/land-development-code.aspx

Section 3.9 Floodplain Development Permit
Many potential treatment areas include unmapped floodplains. Coordination with the Mesa County Public Works Floodplain Administrator is encouraged (call 970-255-5045).

5.2.9 Large Construction Projects and Restrictions
Larger construction jobs hauling more than 4,500 tons of material within one month may be subject to restrictions on County roads. Please coordinate with the Mesa County Public Works Department on individual projects. (call 970-244-1765)

5.2.24 Forestry Support Services
These standards are applicable to any private contractors operating such facilities and operations as part of the treatment program. Please direct any contractors to the Mesa County Planning Division for assistance with permitting requirements. (call 970-244-1636)

7.6.4 Wildlife Habitat Protection
We are certain the Forest Service will consult with the Colorado Division of Parks and Wildlife on potential impacts to wildlife and hunting seasons.

GIS Data
We request the Forest Service provide to Mesa County GIS data sets for the maps in the DEIS so we can better comment on the draft as it is released for public review. Hard copy maps are often difficult to read and use due to the scale of the maps and lack of road labels and other reference points. Our GIS data is also available to the USFS. Please contact our GIS staff at 970-244-1880 for details.

Weed Management
We request that you include a comprehensive weed management plan (including follow-up control measures, watering, fencing, multi-year herbicide application for certain weed species, etc.) as an element of reclamation plans for disturbed areas of harvest, reclamation of new road construction, and any skid roads or other accessory/access roads. Please coordinate with the Mesa County Tri-River Extension Service at 970-255-7121.

County Roads
In accordance with the Mesa County Road Access Policy, we require a Notice of Intent (NOI) to access county roads. Mesa County requires an access permit for any new access or change in use of an access to and from county roads. Additional county permits that may be required include: grading, building, surface disturbance permits for work within County rights-of-way. Any mitigation for potential road impacts should be coordinated with any energy development or other heavy-vehicle and high traffic projects. This appears especially relevant east of Vega Reservoir and on the Grand Mesa Slopes.

Oversize/overweight vehicles on Mesa County roads are required to obtain Extra Legal permits (call 970-244-1765).

Other impacts

- We encourage the USFS and any timber contractors to use Mesa County's web-based GIS tool known as EPOM (Energy Policy Opportunity Map) to identify various potential impacts of concern to Mesa County (e.g., water quality, visibility, noise, dust, etc.) and suggest US Forest Service best management practices be required for all projects.

- Adjacent Property Coordination
  Potential projects on the Forest include numerous adjacent private property in-holdings and lands managed by other federal and state agencies. Proposed treatment areas should done in coordination with private landowners and public land managers regarding issues such as timing, noise, dust, road impacts, and the possibly conducting joint projects on adjacent private and public lands. Coordination with the Colorado State Forest Service is encouraged.

- Energy and Mineral Resources
  Any potential impact on leased natural gas fields or other mineral extraction projects needs to be analyzed and addressed in the EIS including coordination of timing and cumulative impacts. Please see the Mesa County Energy and Mineral Resources Master Plan at: http://www.mesacounty.us/planning/energymasterplan.aspx

- Historic and Scenic Byways and Tourism
  We encourage coordination with Grand Mesa and Unaweep Tabeguache Historic and Scenic Byway Committees and the Grand Junction Visitor and Convention Bureau on timing and other issues (e.g., visibility from Byways, campground and trail closures, special events, etc.).

Thank you for your consideration. Please keep us updated on the project and our request to participate as a cooperating agency.

Respectfully,

Steve Acquafresca, Chairman
Board of County Commissioners

cc: Commissioners Rose Pugliese and John Justman
Tom Fisher, County Administrator
Pete Baier, Public Works Director
Linda Dannenberger, Planning Division Director
Keith Fife, Long Range Planning Director

MONTROSE COUNTY
BOARD OF COUNTY COMMISSIONERS
317 South 2nd Street
Montrose, CO 81401
Phone: 970-249-7755
Fax: 970-249-7761

July 28, 2015

Scott Armentrout
Forest Supervisor
Grand Mesa, Uncompahgre, Gunnison NF
2250 Highway 50
Delta, Colorado 81416

SUBMITTED ELECTRONICALLY AND VIA CERTIFIED MAIL

Re: Draft EIS - SBEADMR Project

Dear Scott,

As you are aware, Montrose County has been an active participant in the SBEADMR process since the original NOI was issued in July of 2013. We continue to support the project goals of resiliency, recovery and public safety. We thank the GMUG and other Forest Service staff for the tremendous amount of work that has been completed in order to bring the project to this point.

The following comments are specific to the Draft EIS (DEIS). We hope that the Forest Service will consider taking action on these comments including incorporating suggestions into the Final EIS and Record of Decision.

1. We appreciate that the Forest Service has maintained a consistent acreage total for treatment in the 70,000 to 120,000 acre range throughout the proposed alternatives. We request that no reduction be made in the total acreage proposed for treatment in any of the proposed alternatives. As noted in the DEIS, the proposed treatment area is already very small relative to both the overall GMUG land base **AND** the spruce-fir and aspen cover types. As stated in the DEIS, "SBEADMR would treat a maximum of 4% of the GMUG, or approximately 8% of aspen and spruce-fir on the landscape." (Page 196). Any further reduction in the area to be analyzed would diminish the return on Forest Service investment and project efficacy.

2. With regard to Alternative 3, we are concerned that limiting opportunities for commercial treatment to the 164,000 acres of suitable timber within the opportunity area may not produce viable timber sales. Limiting the proposed 40,000 to 60,000 acres of commercial treatment to a more finite (164,000 acre) area would reduce flexibility for site selection and incorporation of adaptive management in future project actions. The larger opportunity areas and potential acreages for commercial treatment identified in Alternatives 2 and 4 would better serve project targets and avoid conflict that could arise from directing commercial treatments into a smaller area. We suggest that the Forest Service expand the opportunity area for Alternative 3.

3. The DEIS states, "The GMUG contains approximately 223,000 cumulative acres of spruce beetle mortality and 229,000 cumulative acres of affected aspen accumulated over the past decade, which corresponds to approximately 30% of spruce-fir and aspen on the GMUG." (Page 261). We continue to be concerned about the length of the project timeline as compared to the spread of the beetle epidemic and associated spruce/fir mortality. As noted in the DEIS, "Most (>90%) of mature over-story trees are dying from beetle infestation in affected areas, usually within 18 months to 2 years." (Page 10).

   When considering the limited timeframe (3-5 years) for salvaging merchantable timber from affected stands, it is clear that any delay in the completion of the project and offering of subsequent timber sales could result in salvage/commercial treatment targets becoming unobtainable. Failure to meet these targets would; represent a waste of the tremendous resources expended on the DEIS, result in substantial increases in future treatment costs and deprive the public of significant economic benefit.

4. We remain supportive of the use of resiliency treatments within the project. We are concerned that the scale of the outbreak compared to the size of the treatments may reduce the efficacy of resiliency treatments as compared to commercial salvage. Accordingly, in preparing and implementing proposed treatment methods we request that commercial salvage treatments be given priority over all other treatment methods (including non-mechanical). This prioritization would be an efficient use of Forest Service labor and would address the need to access merchantable timber quickly.

5. The DEIS states, "the Forest is proposing and analyzing treatments of a maximum of 120,000 acres, or 4% of the GMUG, in approximately equal proportions between commercial and noncommercial treatments." (Page 38). This proportion is consistent across all of the action alternatives.

   To the extent possible, we request that the Forest Service consider expanding the proportion of analyzed acreage available for commercial treatments within the 120,000 acres of total treatment area. Increased utilization of commercial treatments would lower treatment costs and provide additional flexibility in adaptive future management over the 8-12 year project period. Any commercial treatments would still need to achieve project objectives and meet design criteria as proposed.

6. In the interest of public safety and to allow for safe management of fire on the landscape, we request revisions to "Hazard Tree Removal" as outlined on page 45. Revised language should specify that mechanical and non-mechanical fuels management activities shall be conducted within a half mile buffer (quarter mile both sides) of roads open to the public and other identified infrastructure. Such revisions are necessary to address increased fire behavior and severity that has recently been observed in beetle killed spruce/fir.

   In reference to beetle-affected stands, the DEIS notes, "field observations during fires suggest these stands experience increased probabilities of torching, crowning and spotting." (Page 181). A primary example of this behavior is the West Fork Complex on the Rio Grande National Forest in 2013. We encourage the Forest Service to take the behavior of the West Fork fire into account when considering buffers for public safety in the Final EIS.

7. We request that "visually sensitive areas" not be automatically excluded from mechanical treatment as currently stated on page 46. Widespread tree mortality in both aspen and spruce/fir cover types will adversely impact visual aesthetics of the forest. Therefore, limiting treatment in these areas would not improve aesthetics, but would limit ability to treat in certain areas. In fact the DEIS notes, "Removing dead and diseased trees in affected spruce stands via recovery treatments would allow existing advanced regeneration to grow faster with less competition for light and moisture, which would improve scenic quality over the long-term." (Page 445).

8. To the extent feasible, we request that trees removed through non-commercial mechanical treatment be made available to the public as firewood. Montrose County is willing to partner with the Forest Service in order to facilitate this process.

9. The DEIS states, "Of these 278,000 acres commercial opportunity acres, 99,000 acres are identified as spruce; 97,000 acres as aspen; and 82,000 acres as aspen-spruce mix. As noted above, commercial aspen treatments are not likely due to the lack of an aspen market at the time of this writing." (Page 51).

   Given the known market for spruce/fir and the limited market for aspen, we request that the Forest Service increase the percentage of spruce or spruce/fir made available within a designated commercial opportunity area in Alternative 2. Even if the geographic location of the commercial opportunity area is altered the total acreage of the area (278,000 acres) could remain the same. By necessity, aspen treatments will need to be non-commercial and therefore a smaller percentage of aspen included in the commercial opportunity area would not adversely impact project goals.

10. The DEIS states, "Non-commercial treatments would occur *outside* suitable lynx habitat, with the exception of hazard tree treatments proximal to infrastructure and fuel treatments within 200 feet of infrastructure." (Page 51). As noted in comment #6 above, we have concerns that this distance may not be adequate to protect the public and firefighter safety during a severe wildfire. We request considering a larger buffer as noted in our comment #6.

11. With regard to "TSHR-1" it would be more practical to restore/improve roads after heavy use. Bonding or other means could be used to provide acceptable surety for required work related to project impacts. (Page 124).

12. The DEIS states, "County road maintenance could result in additional impacts to individuals such as crushing, or removal by road maintenance equipment." (Page 219). We feel that this comment is based on an inaccurate assumption that road work conducted by the County would not be performed to the same standards as work done by the Forest Service or Forest Service contractors. Montrose County and other GMUG counties are fully capable of complying with design criteria and environmental safeguards in the same manner as any other entity performing the work. We respectfully request that this statement and the anticipated impact be removed from the Final EIS.

13. The DEIS states, "Fens are frequently located in areas with slopes less than 40%, so there is the potential for greater conflict of treatment placement and effects to fens and their sensitive species with this alternative." (Page 222).

    We disagree with this assumption. Simply because fens occur at slopes of less than 40 percent does not mean that there would be adverse impact associated with Alternative 4. If properly implemented, the design guidelines and site selection processes in place throughout the SBEADMR proposal would adequately protect fens and other sensitive resources regardless of slope.

14. The DEIS states, "ID Team reviews preliminary treatment units and completes project-specific surveys. Conflicts will be resolved by the District Ranger." (Page C-4). As a procedural matter we believe it is more efficient to resolve such conflicts at the highest possible level. Since the proposed action covers the entire GMUG and multiple ranger districts, we suggest that such conflicts be resolved by the Forest Supervisor or other regional level staff. This practice would assure consistency of decision making and would avoid potential conflicts between ID Team members that may be subordinate in the chain of command to a District Ranger.

15. We suggest that "Estimated Time Since Stand Mortality" be included as a checklist item under the "Timber Surveys" section on page C-9. The temporal aspect of mortality with regard to merchantability is critical enough to the overall project that it should be expressly addressed.

16. The DEIS states, "Because of the 2-3 years needed to plan and implement treatments, GIS analyses will be focused on potential management adaptations 4-5 years in the future." (Page E-5). Given the information presented elsewhere in the DEIS and in our comment #3 above, we are concerned that this processing timeline would preclude stands which have already been or have recently been affected from being commercially treated. Therefore, we request the Forest Service consider means to expedite the processing of commercial treatments.

17. The DEIS "Watershed and Soil Resources" section on page 77 is important to water quality and quantity in Montrose County and across the Western Slope. We find the design features to include protections at a project level on page C-3, but we suggest that this may not capture the need to proactively protect reservoirs and water delivery systems on public lands. This is of immense importance as Colorado develops a water plan and it may require a checklist item to address benefits of timber treatments to reduce wildfire severity and protect water resources. Our agriculture community and Project 7 Water supply will depend on this.

18. The DEIS "Appendix C - Pre-Treatment Checklist", section 6 does not give specifics under Socio-Economics. We suggest that the timber section on page C-18 assess the accountability to meet the timber supply goals found in the Forest Plan. This is perhaps the intent of the Socio-economic checklist on page C-20. Montrose County is committed to protecting our natural resource based companies. In 2010-2012, the county dedicated economic development funds to keep a sawmill in Montrose County. We understand the vulnerability of this industry as evidenced by the loss of Delta Timber in neighboring Delta County and believe that this project is economically critical as evidenced in Table 90 on Page 416.

19. The DEIS, "Appendix E: Public Engagement in Adaptive Implementation" refers to stakeholders and their roles throughout the 10 year process. Given the importance of continued public involvement in adaptive management, we suggest that a formal, structured stakeholder group be formed for the purpose of facilitating ongoing public involvement. The composition of this group should reflect a balanced and diverse representation from the counties containing GMUG lands.

20. We would like to note that even with staffing and budgetary constraints, Montrose County was able to conduct a comprehensive review of the DEIS and draft comments within the timeframe of the original comment period set by the Forest Service. We urge the Forest Service to use any procedural options available to avoid future attempts to stall completion and implementation of this critically important proposed action.

Respectfully,

4

David White
Chairman

Glen Davis
Vice Chairman

Ron Henderson
Commissioner

DON BATCHELDER
LYNN M. PADGETT
BEN TISDEL

BOARD OF COUNTY COMMISSIONERS

541 4th Street • P.O. Box C • Ouray, Colorado 81427 • 970-325-7320 • FAX: 970-325-0452

July 30, 2015

Scott Armentrout
Forest Supervisor
Attn: SBEADMR
2250 Highway 50
Delta, Colorado 81416

Also sent electronically: http://www.fs.usda.gov/goto/SBEADMR_comments

Dear Mr. Armentrout:

The Board of County Commissioners of Ouray County, Colorado supports the efforts of the USFS in working with local communities to determine the best utilization of resources for addressing the current epidemic of diseased spruce and aspen trees in the GUMG. The EIS presents a thoughtful analysis of the alternatives, and the rationale for each. Ouray County appreciates the attention to local input, and the outreach that has been conducted for this EIS. The Board of County Commissioners urges the USFS to take a flexible approach by considering adoption of aspects of Alternatives 2, 3 and 4 as the best approach to maximize treatments and to balance the needs of the communities involved.

A community meeting was held on June 29, 2015, to provide information to the public about Ouray County's more specific White Fir/Fir Engraver Beetle epidemic, and to obtain input on the Draft EIS. Approximately 75 people attended this meeting, which demonstrates the importance of forest health to our community. Although none of the three action alternatives currently include large acreages of land within Ouray County, nevertheless, Ouray County is deeply affected by the forest health and has a vested interest in ensuring that resources are available to combat the continuing diseases and deterioration of forest lands within the County.

The SPEADMR Draft EIS represents a significant improvement over the project-by-project approach to the same problem in the Rio Grande National Forest. That piecemeal process slowed down the response, and that delayed response likely resulted in some of the problems leading to the West Fork Fire Complex in 2013. The SPEADMR Draft EIS is innovative with its Adaptive Management approach, and we support the opportunities for future public input processes shown at Figure 8, at page 40. With some creative thinking, the natural disaster plaguing Colorado's forests can be turned into an economic opportunity for communities to mitigate forest health decline while supporting dependable energy generation and local jobs.

Ouray County has a population of approximately 4,500. The County relies heavily on tourism as a key economic industry. View sheds, as well as environmental health of the watersheds, streams and reservoirs, are important assets. Dead and diseased trees, regardless of land ownership, detract from the scenic vistas enjoyed by residents and visitors alike. Our visitors come to hike, fish, horseback ride, jeep, and ski in the mountains, including the GUMG. We support efforts to remove as many dead and dying trees as possible, to find creative solutions to removing additional trees through private permits and trained volunteer efforts, and to proactively treat and protect against further loss of trees, as well as actions that will foster regrowth and rejuvenation of forest lands.

In addition to the focus on tourism and recreation, Ouray County also is concerned with the potential for wildfire. While the County collaborates with its local partners to prepare for wildfire emergencies, and to mitigate wildfire conditions, Alternative 3 provides the needed support from the USFS for prioritizing areas of greatest potential human impact. Wildfires are expensive and potentially deadly, and a wildfire in Ouray County would be extremely debilitating to the local economy, as well as an

immediate threat to human safety. For this reason, the County supports the direction of Alternative 3, but requests that the areas of treatment include more lands in the proximity of the City of Ouray and the Town of Ridgway, and requests that the proposed treatments be expanded to include white fir/fir engraver beetle management, given the similarities with the spruce beetle. Studies have concluded that thinning/decreasing density is the only clearly effective method for long-term survival of stands affected by fir engraver beetles. *See:* J.M. Egan, Jacobi et al. in "Forest thinning and subsequent bark beetle-caused mortality in Northeastern California", *USFS and CSU, Forest Ecology and Management 260 (2010) 1832-1842.*

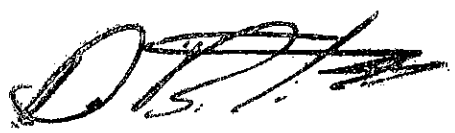
Ouray County also supports aspects of Alternatives 2 and 4, and believes that adaptive management and flexibility are critical to successful efforts at limiting the rapidly increasing acreage affected by beetles and other diseases. Focusing on the treatment of coniferous species may be more productive and cost effective than efforts directed toward aging aspen stands. As a result, Ouray County supports incorporating flexibility into a final action plan to allow USFS personnel to adapt quickly to changing circumstances and needs.

While Ouray County is mindful of the concerns expressed by some to limit roads, we again suggest a flexible and adaptable approach to adopting an action plan that permits more specific determination of where roads are necessary, where existing roads can be used to limit new landscape cuts, and an analysis of needs to support any new roads as more specific determinations of acreage locations and treatment plans become more clear. Additionally, as has been demonstrated recently on the Uncompahgre Plateau, new methods of decommissioning roads is much more successful than in the past, which should result in less long-term environmental impact from roads temporarily used or created to harvest or treat affected stands.

During the period that this EIS has been in drafting and process, the number of affected acres has more than doubled. By the time the process is completed, additional acres will also be affected. We urge an action plan that allows USFS adapt to these changing circumstances and facts in making professional determinations about specific areas for various treatments, including logging of diseased trees. Certainly a wide-spread wildfire situation is more likely to result in additional roads and uncontrolled long-term visual impacts than allowing the USFS to make decisions about how and where roads are necessary to accomplish the important goals of the action alternatives.

In closing, Ouray County supports the efforts of the USFS in determining a flexible action plan to address this important forest health emergency. Ouray County also supports additional funding to allow expansion of the treatment efforts to cover more acreage given the rapid increase in acreage affected by diseased and dying trees, and to expand into areas of white fir affected by engraver beetle infestations.

Sincerely,



Don Batchelder, Chair
Ouray County Board of County Commissioners

SAN MIGUEL COUNTY

BOARD OF COMMISSIONERS

Submitted electronically via www.fs.usda.gov/ goto/SBEADMR_comments

July 31, 2015

Scott Armentrout
Forest Supervisor
Grand Mesa-Uncompahgre-Gunnison National Forest
2250 Highway 50
Delta, CO 81416

Re: SBEADMR Draft EIS Comments

Dear Scott:

Thank you to the agency for this opportunity under NEPA for local government to comment on the SBEADMR draft EIS.

We very much appreciated your working with the Public Lands Partnership to do initial scoping through a working group process and to collaboratively engage various stakeholder groups to achieve better understanding of the Forest Service's proposal and intentions.

However, we are deeply disappointed that the on-going adaptive management process outlined in the draft EIS does not include a stakeholder FACA committee to continue the collaboration process through the life of the ten-year project -- as many of us had been led to believe at the start of the scoping.

There are a number of environmental concerns about regeneration, fire, windthrow, lynx habitat and lots of site-specific issues that we were hoping would be addressed by this long-term collaborative advisory group. But without that process, we are worried.

We support the agency's seeking flexibility to deal with the insect outbreaks and to make some economic use of salvage trees. But we don't think the agency has established enough trust with various stakeholder groups to allow a blanket, ten-year program without more analysis and NEPA process, unless a stakeholder advisory council is part and parcel of the adaptive management program for SBEADMR.

Many of us thought this was going to be a ground-breaking push on the part of the Forest Service to do things differently. But instead, from the draft EIS, it appears that, yes, there will be "adaptive management" promised by the agency but without real community buy-in or long-term participation.

The draft EIS seems to set up the "trust-us-we're-professionals" attitude towards the community that we were hoping we'd gone beyond.

Various "stakeholder opportunity" slots are identified, but it appears that no organized group advisory process is established. We think this is a mistake and suggest, instead, that you establish an inclusive, knowledgeable core group of stakeholders to follow this process through. The "stakeholder opportunity" option will make it impossible to establish continuity necessary for stakeholders to be truly involved. As presented, new people will continually join the process, who will have to get up to speed and be re-educated at each opportunity slot. A better option would be to establish a dedicated group of representatives involved from the beginning who can help shape issues and solutions as part of the adaptive management process.

While we think this project has a lot of merit, without a formal advisory group process to involve stakeholders at each step along the way, we cannot support it.

Regretfully,

SAN MIGUEL COUNTY
BOARD OF COMMISSIONERS

Joan May, Chair